REDACTED VERSION

Facility Response Plan

Sunoco Partners Marketing & Terminals L.P. (SXL)
Nederland Terminal
2300 North Twin City Highway
Nederland, Jefferson County, Texas

Date: July 2013
FRP Number: FRP-06-TX-00402

Emergency Response Action Plan

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CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
1	November 2012	Plan Re-draft.	Entire Plan
2	1/22/2013	Hard copy submittal the MSU Port Arthur	Entire Plan
3	2/13/2013	Included FRP-06-TX-00402	Cover Page
4	4/8/2013	Included Construction Date to Tank Schedule	16
5	7/2/2013	Expanded Detailed Discharge Scenarios	34, 37 & 41
6	7/8/2013	Submittal to EPA	-

1.0 INTRODUCTION

1.1 Purpose / Scope of Plan

This Nederland Terminal Emergency Response Action Plan (ERAP) provides guidelines to assist in managing an emergency. The primary goal of this ERAP is to provide tools to enable an efficient, coordinated, and effective response to emergencies.

The ERAP is not meant to replace common sense or actions not specifically described herein.
Responders should continually evaluate the effectiveness of actions called for in this ERAP and make the appropriate adjustments based on past experience and training.

This ERAP contains tactical response plans that identify site specific potential response strategies. Response strategies, equipment and manpower requirements, and site conditions are based on conditions that were present during site assessments. Actual conditions at the time of a response may vary significantly and may necessitate the need for a different strategy and/or equipment requirements. The strategies and equipment lists contained in this ERAP should be used as guidelines only.

This document is intended to satisfy the requirements of 29 CFR 1910.38(a)(2) and 1910.120(l)(2) (OSHA Emergency Response Plan and Emergency Action Plan) and 40 CFR Part 112.20 (EPA Emergency Response Action Plan). Cross-references for these regulations are located in **APPENDIX A** of the Facility Response Plan.

1.2 Plan Review and Update Procedures

The ERAP will be reviewed and modified as appropriate to address new information. Plan revisions will be numbered sequentially and entered on the Record of Changes Form. The change numbers, date, and description of change will also be entered on the form. These changes are then to be distributed to all plan holders on the Distribution List.

1.3 Facility Description

The Nederland Terminal is a bulk liquid, marine terminal located on the Neches River and handles crude and oil products for third party customers. Oil storage operations at the Nederland Terminal began in 1901. Growth and expansion of Terminal capacity has occurred since that time resulting in the current facility. Nederland Terminal is located on 1,100 acres and has tankage capacity to store 20 million barrels (bbl) of crude oil and 500,000 bbls of lube oil. The largest crude oil storage tanks within Sunoco Logistics Partners L.P., six 600,000 bbl and three 400,000 bbl tanks are located at this facility. This facility has 5 ship docks, three barge docks and rail car unloading facility. Vessels as large as 120,000 dry weight tonnage (DWT) and 40 foot drafts can be moored at all ship docks. Nederland Terminal river frontage property line covers approximately 1.75 miles along the Neches River. All aboveground storage tanks are within secondary containment dikes that are designed to contain at least 110% of the largest tank's volume.

1.4 Qualified Individuals

Qualified Individuals (QI's) are facility personnel responsible for initiating a response, including: activating and contracting with oil spill removal organization(s); liaison with Federal On-Scene Coordinator; and obligating funds. All QI's have received the 40 hr OSHA training course for first responders and have received the annual 8-hr refresher course. All QIs have full authority to implement the facility response plan.

TABLE 1-1 – QUALIFIED INDIVIDUALS CONTACT INFORMATION

Name	Title	Phone Number	Response Time
Wayne Turner	Terminal Manager Nederland	409-721-4824 (Office) (b) (6) (Mobile)	1.5 hrs
E.M. Clark	Lube& Lab Supervisor/Security	409-721-4851 (Office) (b) (6) (Mobile)	0.5 hrs
Glenda Davalos	Crude Operations Manager	409-721-4839 (Office) (b) (6) (Mobile)	0.75 hrs
Stephen May	Maintenance Supervisor	409-721-4898 (Office) (b) (6) (Mobile)	0.5 hrs

2.0 Emergency Notification Phone List

EMERGENCY NOTIFICATION PHONE LIST
Reporter's Name:_____ **Date**:_____
Facility Name: _____ **Phone:** (___) - _____ **Fax:** (___) - _____
Owner Name: Sunoco Partners Marketing & Terminals L.P.
Facility Identification Number: _____
Date and Time of NRC Notification:_____

All personnel listed as a responder for SXL has the required level of training in accordance with 29 CFR 1910-120. Training records are available upon request.

TABLE 2-1 EMERGENCY NOTIFICATION CONTACT INFORMATION

AGENCY NAME	TELEPHONE NUMBER
Federal Agencies	
National Response Center *****Any oil spill to navigable waters.*	800-424-8802 (24 hr Spill Reporting)
US Coast Guard MSO Port Arthur	409-723-6500
US EPA Region 6	214-665-6428 866-372-7745
US Fish and Wildlife Houston, TX	281-286-8282
U.S. Fish and Wildlife Service Region 2 Albuquerque, NM	505-248-6802
State Agencies	
Texas General Land Office (TGLO) *****Any oil spill that threatens waters of the Texas Gulf Coast. Report any discharge with the potential to impact state waters and/or any discharge originating in state waters.*	800-832-8224 (24 hr Spill Reporting)
Railroad Commission of Texas – District 3 Houston, Texas *****Any crude oil spill to water. Crude oil spills over 5 bbls.*	713-869-5001
Texas Commission on Environmental Quality Region 10 – Beaumont, Texas	409-898-3838
Texas Parks and Wildlife – Beaumont, TX	409-736-2551
State Police	512-873-3100
SERC	512-424-5677
Fire Marshall	512-305-7900
Local Agencies	
Jefferson County Sheriff	911 / 409-835-8411
Nederland Police Department	911 / 409-723-1518
Nederland Fire Department	911 / 409-723-1531
Jefferson County LEPC	409-835-8757
Oil Spill Response Organizations (OSRO's)	
Garner Environmental-Port Arthur, TX	409-983-5646/800-424-1716 (24hr)
Oil Mop LLC Port Arthur, TX	409-962-7226/800-645-6671(24hr)
National Response Corporation	631 224-9141/800-899-4672 (24hr)

TABLE 2-1 Continued

AGENCY NAME	TELEPHONE NUMBER
Waste Management	
City of Nederland	409-723-1504
City of Port Neches	409-727-2181
Water Intakes	
Huntsman, Inc.	409-722-8381
Sunpol, Inc.	409-722-8321
Texas Eastern Pipeline Company	409-722-0291
Unocal/Chevron Oil Terminal	409-722-3441
Wildlife Rehabilitation	
Coalition, Inc. Houston, TX	713-468-8972
Gulf Coast Humane Society Corpus Christi, TX	512-225-0845
Wildlife Rehab and Education League City, TX	281-332-8319
Wildlife Rescue and Rehabilitation Unit Boerne, TX	210-698-1709
Weather	
National Weather Service Houston, TX	281-337-5074
National Weather Service Lake Charles, LA	337-477-5285
Hospitals	
CHRISTUS Hospital-St. Mary Port Arthur, TX 77642	409-985-7431
Medical Center of Southeast Texas Port Arthur, TX 77640	409-724-7389
Television Stations	
12 News KBMT (ABC Affiliate)	409-833-7512
6 News KFDM (CBS Affiliate)	409-892-6622
Fox 4 KBTV (FOX Affiliate)	409-840-4444

TABLE 2-2 – ERP CONTACT INFORMATION

EMERGENCY RESPONSE PERSONNEL			
Name/Title	**Contact Information**	**Response Time**	**Responsibilities During Response Action**
Wayne Turner Terminal Manager **Qualified Individual**	409-721-4824 (Office) (b) (6) (Mobile)	1.5 hrs	Incident Commander
E.M. Clark Lube& Lab Supervisor/Security **Qualified Individual**	409-721-4851 (Office) (b) (6) (Mobile)	0.5 hrs	Support Incident Commander
Glenda Davalos Crude Operations Manager **Qualified Individual**	409-721-4839 (Office) (b) (6) (Mobile)	0.75 hrs	Planning Section Chief
Stephen May Maintenance Supervisor **Qualified Individual**	409-721-4898 (Office) (b) (6) (Mobile)	0.5 hrs	Operations Section Chief
Brian Hudgins Operations Supervisor	409-721-4880 (Office) (b) (6) (Mobile)	0.5 hrs	Support or Relief Planning Section Chief
Curtis Kingston Safety Specialist	409-721-4886 (Office) (b) (6) (Mobile)	0.5 hrs	Safety Officer
Michael Everett Electrician	409-721-4897 (Office)	1 hr	Staging Group Leader
Ronald Page Maintenance	409-721-4899 (Office) (b) (6) (Home)	0.5 hr	Repair & Containment Group Leader
Justin Minter Environmental Compliance	409-721-4802 (Office) (b) (6) (Mobile)	1 hr	Environmental Liaison

TABLE 2-2 Continued

EMERGENCY RESPONSE PERSONNEL Continued			
Bill Wheeler Administrator Manager	409-722-0894 (Office) (b) (6) (Mobile)	1 hr	Logistics Section Chief
Jona Newton Scheduler Assistant	409-721-4823 (Office) (b) (6) (Mobile)	1 hr	Documentation Unit Leader
Tommy Wells Fire Chief	409-721-4800 (Office) (b) (6) (Mobile)	0.5 hrs	Fire Suppression Group Leader
Brenda Theroit Accounting Assistant	409-729-2263 (Office) (b) (6) (Home)	0.5 hrs	Accounting/ Procurement
Karen Carter Senior Accounting Clerk	409-729-2870 (Office)	1 hr	Accounting/ Procurement
Charles Green Maintenance	409-721-4899 (Office)	1 hr	Decon
Marshall Murphy Manager Right of Way	281-637-6415 (Office) (b) (6) (Mobile)	2 hrss	Claims/ Compensation
Will Rothstein Business Development	409-721-4822 (Office) (b) (6) (Mobile)	1 hr	Business Resumption
Acadian Ambulance Service Emergency Medical Group Leader	409-980-7702 (Office)	1 hr	Medical Group Leader

3.0 Spill Response Notification Form

Use this form prior to calling the National Response Center as the operator will ask for the following information. **Do not delay report to research information.**

(Example)
Reported By:

Record the Following for NRC Report: (800)424-8802 /

Date:_____ Time:_____ Name of NRC employee who received the information:_____

Incident report number, assigned to this incident by NRC: _____

Person making report: _____Phone Number: _____

Position: _____ SXL Facility Name:_____

Responsible Party: _____

Date of Incident:_____ Time of Incident:_____

Description of incident (including distance & direction from nearest body of water); Use present location if a moving spill:_____

Oil name/ type of material involved:_____

Weather conditions on scene:_____

Estimate of amount of material lost and rate of release (if continuing): _____

Time and duration of the release: _____

Cause and circumstances of spill (should not be reported until verified unless that is no doubt or cause is obvious to public): _____

Facility Storage Capacity: _____bbls Location: Lat_____ Long _____

Description of area(s) likely to be affected, such as river, river bank, beach, wildfire area, or other properties; _____

Have there been any evacuations? _____

Actions being taken at the scene to contain spill, if any, and proposed cleanup measures:

_____

_____

_____

Agencies or persons already notified (or who will be notified): _____

Personnel already on scene (or nearest to scene):

Contact person/telephone # (on or nearest to scene):

Existing and potential hazards of fire, explosion, etc., if any:

Personal injuries or deaths, if any:

Person(s) who discovered and/or are reporting spill:
Name: Phone:
Name: Phone:

Name of the operator: Address of the operator:

Completed and/or proposed actions to contain, cleanup and dispose of spilled material:

Extent of containment of land, water, or air, if known:

Other significant, unique or unusual circumstances known that are relevant to cause or extent of damage:

Follow-up notification should include:

Name of reporter: Incident Number

Time /Date of discharge:

Location of Discharge:

Name of oil discharged: Estimated volume:

Weather conditions on scene at the time of discharge and clean up operations:

4.0 Response Equipment List and Location

4.1 Response Equipment

Emergency equipment is available to allow personnel to respond safely and quickly to emergency situations. Fire extinguishers are located throughout the facility and meet National Fire Prevention Association (NFPA) and OSHA standards. This equipment is maintained regularly and inspected on a monthly basis.

In addition to the above mentioned equipment, the following emergency equipment is available at the Nederland Terminal:

TABLE 4-1 – FACILITY EQUIPMENT

Category	Type/ Model	Quantity	Size	Year Purchased	Operational Status	Location at Facility
Containment Boom	American Boom	7500	18	2006-09	good	Reels at each Dock
Response Boat	Crestliner	1	18ft w/ 90 hp	2002	good	Firehouse
Response Boat	Weld-Craft	1	18ft w/ 115hp	1998	good	Firehouse
Response Trailer	Wells Cargo	1	24 Foot	1994	good	Firehouse

Each listed OSRO has their own response equipment, a minimum of 1,000 feet of containment boom, absorbents, boats, and vacuum trucks. Lists of the OSRO's equipment resources may be found in their services contract. OSRO response equipment is inspected and refurbished after every use which is typically more than once a week. The primary OSRO's equipment is checked monthly or at a minimum of once every two months.

Response Equipment will be supplied by the OSROs listed in **Table 2-1**. SXL requires an annual certification from each OSRO under contract to assure compliance with the PREP guidelines.

All OSRO's listed in this plan (see Table 2-1) are rated as Level E for rivers & canals which requires at a minimum:

- **6,000 barrels/day recovery**
- **4,000 ft Containment**
- **22,000 ft Protective boom**
- **12,000 bbls temporary storage capacity**
- **Response time 54 hrs in high volume port 60 hrs for other locations**
- **Vessel response times 60 hrs for high volume ports 72 hrs for all other locations.**

5.0 Response Equipment Testing and Deployment

TABLE 5-1 - RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

6.0 Facility Response Team

TABLE 6-1 – FACILITY RESPONSE TEAM CONTACT INFORMATION

FACILITY RESPONSE TEAM		
Name/Title	**Contact Information**	**Response Time**
Wayne Turner Terminal Manager **Qualified Individual**	409-721-4824 (Office) (b) (6) (Mobile)	1.5 hrs
E.M. Clark Lube& Lab Supervisor/Security **Qualified Individual**	409-721-4851 (Office) (b) (6) (Mobile)	0.5 hrs
Glenda Davalos Crude Operations Manager **Qualified Individual**	409-721-4839 (Office) (b) (6) (Mobile)	45 mins
Stephen May Maintenance Supervisor **Qualified Individual**	409-721-4898 (Office) (b) (6) (Mobile)	0.5 hrs
Brian Hudgins Operations Supervisor	409-721-4880 (Office) (b) (6) (Home) (b) (6) (Mobile)	0.5 hrs
Justin Minter Environmental Compliance	409-721-4802 (Office) (b) (6) (Mobile)	1 hr
Curtis Kingston Safety Specialist	409-721-4886 (Office) (b) (6) (Mobile)	0.5 hrs
Tommy Wells Fire Chief	409-721-4800 (Office) (b) (6) (Home) (b) (6) (Mobile)	0.5 hrs
Duty Foremen N/A Shift Supervisor	409-721-4844 (Office) (b) (6) (Mobile)	On-Site

7.0 Facility Evacuation Plan

In the event that an evacuation of the terminal and office building is required, the following procedures will be in effect: **see Evacuation Diagram Section 9 & Appendix E**. Please note evacuation routes, assembly points, arrival routes and other pertinent information on the enclosed. Based on the extent of the incident, community evacuation plans will be implemented and followed as needed through local authorities.

Prior to Evacuation

a. Activate the emergency alarm/s,
b. Make pertinent emergency notification(s),
c. Quickly review product hazards,
d. Evacuees are to assemble at one of the two designated areas as instructed by the Incident Commander.

Refer to the specific emergency plan for the cause of evacuation (i.e. bomb threat, fire, spill, etc.) and take appropriate actions prior to the evacuation. Hazards imposed by spilled materials can include; fire, explosion, contamination and health related concerns.

Evacuation Action

a. Anyone in the terminal and office areas will evacuate the premises upon notification and will report to the assigned assembly point,
b. If the primary assembly point is blocked due to the emergency or other circumstances, personnel are instructed to head up-wind, whether in vehicles or on foot.

At the Assembly Point

a. The incident commander or designated representative shall account for all persons known to be in the terminal.
b. Attempt rescue effort if necessary ONLY IF rescue can be done safely.
c. Confirm emergency notifications were made.

If the incident does not warrant complete evacuation of the facility, then the office building should be used as an alternative shelter. If needed, the local police, fire and emergency response contractors would be utilized to implement the local emergency evacuation plan for the general terminal locale. A mobile command center would be established as appropriate.

An example of an evacuation checklist is presented in Table 7-1:

TABLE 7-1: EXAMPLE EVACUATION CHECKLIST

EVACUATION CLECKLIST	
TASK	INITIALS
Request assistance from off-site agencies; convey Command Post's location	
Assemble personnel at predetermined safe location: upwind/up gradient of release (assembly area)	
Account for Company and contractor personnel	
Assess casualties (number/type/location)	
Determine probable location of missing personnel	
Secure site, establish re-entry point and check-in/check-out procedures	
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.)	
Monitor situation (weather, vapors, product migration) for significant changes	
Assist in developing a Rescue Plan if necessary	

8.0 Immediate Actions

An example of a Spill Response Action Checklist is provided in Table 8-1.

TABLE 8-1 – SPILL RESPONSE ACTION CHECKLIST

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
DOCUMENT ALL ACTIONS TAKEN		
First Person to Discover Spill		
Immediately notify Qualified Individual and Operations Control Center or posted emergency contacts. Take appropriate action to protect life and ensure safety of personnel.		
Immediately shut down terminal operations (if applicable). Remotely controlled motor operated valves will be closed by the Operations Center as soon as a leak is detected.		
Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.		
Advise personnel in the area of any potential threat and/or initiate evacuation procedures.		
Qualified Individual		
Assume role of Incident Commander until relieved.		
Conduct preliminary assessment of health and safety hazards.		
Request medical assistance if an injury has occurred.		
Evacuate nonessential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if necessary).		
Make appropriate regulatory notifications. • National Response Center • Appropriate State Agency		
Call out spill response contractors (See List in **TABLE 2-5**)		
If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.		
If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that flammable vapor concentrations are within safe atmosphere before sending personnel into the spill area.		

TABLE 8-1 Continued

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
Qualified Individual (Continued)		
If safe to do so, direct facility responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.		
For low flash oil (<100ºF), consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.		
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.		
Notify Local Emergency Responders. Obtain the information necessary to complete the Accident Report - Hazardous Liquid Pipeline Systems (**APPENDIX B**) and phone this information to the HES Manager.		
On-Scene Coordinator		
Activate all or a portion of ERP (as necessary). Liaison Officer will maintain contact with notified regulatory agencies.		
Ensure that ERP have mobilized spill response contractors (if necessary). **It is much better to demobilize equipment and personnel if not needed than to delay contacting them if they are needed.**		
Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
Water Based Spills: Initiate spill tracking and surveillance operations utilizing information in **SECTION 4.2**. Determine extent of impact via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in **SECTION 4.3**. Send photographer /videographer if safe.		
Land Based Spills: Initiate spill tracking and surveillance if applicable.		
SECONDARY RESPONSE ACTIONS (Refer to ERP job descriptions in **APPENDIX D**)		

8.1 Resource Requirements for Small, Medium and Worst Case Spills

In order to adequately anticipate the resource requirements for each of the three spill scenarios, it is critical to identify the probable sources for each type of spill. This is particularly significant because the location of the spill is just as important as the size of the discharge in terms of manpower and equipment selection.

SMALL <2100 gallons released

Probable Source Selection

X	Pump Seal Leak	X	Line Rupture	X	Valve Leak
	Container Rupture	X	Loading Overfill		

MEDIUM >2100 to <36,000 gallons released

Probable Source Selection

X	Tank Truck Rupture	X	Valve Rupture	X	Line Rupture
X	Small Tank Failure	X	Loading Overfill		

WORST-CASE >36,000 gallons or 110% Volume Largest Tank

Probable Source Selection

X	Earthquake-induced Spills	X	Hurricane-induced Spills
X	Tornado-induced Spills	X	Catastrophic Tank Shell Failure
X	Tank Fire	X	Pipeline Manifold Rupture

8.2 Response Procedures for Each Scenario

The following are steps facility personnel or contracted personnel would follow to mitigate and respond to the worst case discharge, a medium discharge, and a small discharge:

1. Briefly assess the incident to determine the extent of discharge
2. Activate incident command structure
3. Perform emergency notification
4. Evacuate facility (if necessary)
5. Develop an action plan
6. Choose the necessary equipment to control the spill (1000 ft of containment boom within 1 hr)
7. Initiate spill control procedures
8. Initiate recovery operations
9. Surfactants are prohibited from being used on an oil spill in the water, and that dispersants can only be used with the approval of the Regional Response Team.
10. Arrange disposal of waste material. Recovery of any free product. Soil

contamination would be evaluated and remediation in concert with agency requests would be implemented. Free product would be collected via a vacuum truck and transported to an approved disposal facility (list provided in section 4 of FRP). For smaller spills, spill pads and other adsorbent material would be used to contain and collect free product. The adsorbent material would be placed in drums or roll off boxes for disposal at an appropriate facility.

11. The facility will utilize the Texas General Land Office, Texas Coastal Planning Response Toolkit to protect sensitive areas and respond to oil spills. The Toolkit contains a Texas Geographic Response Plan Index Maps/site specific tactical plans (response strategies). Examples of the Texas Geographic Response Plan Index Maps/site specific tactical plans (response strategies, booming points) are in **Appendix E.** The Toolkit is available on a CD or on the internet at http://gisweb.glo.texas.gov/atlas/masterpage.pdf

8.2.1 Small Discharges

Possible Scenario - the average most probable release of less than or equal to 2100 gallons could occur in the following situations:

Pump seal leaks

Pump seal leaks may occur when the mechanical or structural integrity of a pump fails. The maximum amount of product that could be lost through leakage is 500 gallons. The appropriate emergency response procedure would consist of:

1. Prompt closure of appropriate valves
2. Internal notifications and OSRO for vacuum truck services, dependent on volume.
3. External notifications.

After free product recovery from diked area, soil contamination would be evaluated and remediation in concert with agency requests would be implemented.

Line/Valve leaks

Line or valve leaks may occur when the mechanical or structural integrity of the equipment fails. A line leak would be visible immediately if a leak occurred in an aboveground section of line. Underground leaks may not be detected immediately unless a drop in pressure occurs or product comes to the ground's surface.

Leaks in aboveground lines and valves are minimized by daily inspections for signs of corrosion or weeps. If potential problems are detected, arrangements are made to take the subject line or valve out of service for repairs/replacement. Leakage of product would be into the surface of the ground.
The appropriate emergency response procedure would consist of:

1. Prompt closure of appropriate valves
2. Internal notifications and OSRO for vacuum truck services, dependent on volume.
3. External notifications.

Overfill at loading rack

It is possible that the an overfill of a bottom or top loading trailer could occur, though this is minimized due to the use of pre-set volume meters, Scully overfill protection, and the required presence of the driver. Any release would be less than 100 gallons of product. A release at the loading rack would be contained as spilled product would enter drains specifically located to receive spillage. The drains are tied into the terminal sewer system which leads to the separator.

The appropriate emergency response procedure would consist of:

1. Stop the flow of product by hitting the emergency stop switch.
2. Secure the rack and any other necessary area to prevent access by unauthorized persons.
3. Make appropriate internal and regulatory notifications and requests for services to emergency response contractors.
4. Any residual product on the concrete rack apron is washed into the separator.
5. Utilize an emergency response contractor's vacuum truck to pump accumulated product out of the separator.
6. If necessary, use absorbent material to clean up any residual petroleum from the concrete. Both on-site personnel and emergency response contractors would be utilized as needed.

Safety Precautions

In the case of any of the above mentioned SMALL probable source occurrences, Safety precautions would consist of measuring LEL and total volatiles prior to entering the affected area. If either reading precludes safe entrance, either the application of water spray would be used to knock down vapors or the local fire department would be contacted for application of a vapor suppressant.

Additional Considerations:

- Walk perimeter of site to evaluate/assess any effect on streams; adjacent properties.
- Safety considerations.

- Exposure evaluation.
- Refer to pre response planning map.
- Is volume and location such that it can be absorbed or flushed to the collection sump.
- Evaluate whether contaminated soils will need to be addressed

8.2.2 Medium Discharges

Possible Scenario - a maximum most probable release of greater than 2100 gallons but less than 36,000 gallons could occur in the following situations:

Line/Valves

Aboveground line or valve ruptures may occur in an area where lines/valves are not contained. Pressure relief valves/gauges in the rack manifold area may rupture during loading because of vibrations caused by pumps. In this case, the break would be noticed immediately during the loading. Each line has a few valves so that a loss could be minimized by prompt closure of other valves (at the terminal). The appropriate emergency procedures would include the following:

1. Close the appropriate valves to minimize loss.
2. Make internal notifications and contact OSRO(s).
3. Complete external notifications.
4. Designate command center.

An assessment of threat to environmentally sensitive areas would be made and protective measures would be performed as needed. Portable tanks would be arranged for to store recovered product.

Small tank failures

Small tank failures would result in spilled product being retained within dike area. Area would be secured; proximity to load rack would prohibit any loading. The following emergency response actions would be taken.

1. Operator will verify that dike drains are in a closed position.
2. Secure the area to prevent access by unnecessary or unauthorized person.
3. Make internal notifications.
4. Contact OSRO/Emergency response contractors for vac truck and other necessary sources.
5. Make appropriate agency notifications.
6. Inspect tank farm perimeter to ensure integrity of dike.
7. Use vacuum truck(s) to recover contained product.

If the product is clean enough, it would be reintroduced into storage. Otherwise, recovered material will be disposed of off-site at an approved facility. After recovery of all products, timely evaluations of any further response actions will be made.

Overflow of Storage Tank

An overflow of a storage tank within the tank farm could occur due to a failure of a high level alarm system. Secondary containment areas are more than adequate, so product would be contained within the diked area. Product would be released at approximately 1,500 bph resulting in a maximum spill of 200 barrels. In addition to the procedures listed above (small tank failure), this situation would warrant the following:

1. Immediately notify the pipeline of the overflow so that receipt could cease.
2. Recovery activities identical to those in Small Tank Failure would be followed.

Tank Truck Rupture

Tank truck rupture could result in the loss of a maximum of 9,000 gallons. If this were to occur on site, the containment/ emergency response would be essentially identical to that of a release/overfill at the rack (see above). The product would be contained in the collection sump, and the emergency response would be identical.

Safety Precautions

In the case of any of the above mentioned MEDIUM probable source occurrences, measurements of both LEL and volatile petroleum vapors will be taken to determine necessary PPE. If LEL/vapors are such that safe entry can not be made either a light water spray will be applied to the pooled petroleum or the local fire company will be requested for a vapor suppressant foam application.

Post-incident review will be conducted to establish causes and develop corrective/preventative measures.

Additional Considerations:

1. Safety.
2. Exposure.
3. SXL tankers for recovered product.
4. Perimeter tour to assess off-site impacts.
5. Verify dike drains closed
6. Can spill be dammed up.
7. If stream has been impacted install booms or if appropriate underflow dams - refer to pre response plan maps.
   Impacted soils need removal.

Other Factors Affecting Response Efforts

1. Proximity to down gradient wells, waterway and water intakes
2. Proximity to fish, wildlife and sensitive areas
3. Likelihood that the discharge will travel offsite
4. Location of Spill
5. Material Discharged
6. Weather or Aquatic Conditions
7. Available Remediation Equipment
8. Probability of chain reaction failures
9. Direction of Spill Pathway

8.2.3 Worst Case Discharge

Based on the EPA worst case discharge volume, a multiple tank facility acts as one storage unit unless evidence is shown to contradict this idea.

The worst case scenario at Sunoco Nederland Terminal may occur in the following situations:

Catastrophic tank failure

A catastrophic failure of a tank could result in an unknown percentage of the total volume of product escaping the containment area either due to wave effect or a breach of the dike wall. Detection of an incident of this nature would result in the enactment of the following emergency procedures:

1. Make internal notifications.
2. Contact Emergency Response contractors (OSROs), so that material containment and recovery can be initiated.
3. Notify appropriate agencies to activate Area Contingency Plan.
4. Call emergency management agencies and police if applicable, to initiate evacuation of residents down gradient of the failed tank.
5. Request portable tanks by contract if needed. Recovered product may also be returned to product tank if clean or be trucked to slop tanks.
6. A preliminary reconnaissance will be conducted so that specific response needs can be established. Such as swales, small streams will be dammed or boomed to contain product.

Tank Fire

The Nederland Terminal has local fire response arrangements with the local fire departments, either for foam application and/or cooling of adjacent tanks. In the event of a tank fire, fire fighters from neighboring municipalities will respond. As a back-up to all the above, SXL has a national contract with Chubb National Foam for supplying foam for a major tank fire. SXL has a national contract with

Williams/Boots & Coots (Houston, TX) for application of foam and any other major fire response activities.

Pipeline Manifold Rupture

A pipeline manifold rupture can result in a land-based spill. This would occur until personnel were able to close the terminal and tank valves. The following emergency response procedure would be followed:

1. Immediately notify Pipeline so that receipt could cease.
2. Notify the National Response Center and make internal notifications.
3. Notify emergency services for fire fighting and evacuation services, if appropriate.
4. Contact OSROs for spill response and containment.
5. Notify external agencies.
6. Bring in SXL staff from Philadelphia and/or other facilities for environmental assessment, public relations, site safety, etc.
7. Arrange the following services including but not limited to: emergency lighting, portable tanks, and portable sanitary facilities.
8. Bring in NRDA contractors.
9. Request portable tanks by contract if needed. Recovered product may also be returned to product tanks if clean or be trucked to slop tanks.

Safety Precautions

In the case of any of the above mentioned WORST CASE probable source occurrences, safety precautions identical to those explained in the MEDIUM probable source occurrence would be followed.

Additional Considerations

* Safety considerations due to ignitability/flammability of petroleum remove sources of ignition, ground recovery equipment; monitor LEL continuously.
* Establish hot and safe zones based on LEL and Benzene inhalation standards.
* Arrange for empty SXL tankers and tanks for recovered product storage; arrange transport to refinery or TSDF/Recycler.
* Daily status/planning meetings to assess effectiveness of recovery program.
* Establish extent of impact –
* Notify refinery wastewater treatment personnel if product in refinery sewers.
* Verify no impact on sanitary sewer system.
* Establish containment methods/ devices - in surface water boom below. Refer to pre-response planning maps for boom, dam etc. locations.

Other Factors Affecting Response Efforts

1. Assuming catastrophic tank and dike failure 25,200,000 gallons/600,000 barrels.
2. Proximity to downgradient wells, waterways and water intake.
3. Proximity to fish wildlife and sensitive areas. Sensitive areas are identified in the attached figures.
4. Likelihood that the discharge will travel offsite.
5. Location of spill.
6. Material discharged.
7. Weather or aquatic conditions.
8. Available remediation equipment.
9. Probability of chain reaction failures.
10. Direction of spillway.

9.0 Facility Diagrams

The following facility diagrams are included in Section 9.0:

1. Nederland Terminal Plot Plan
2. Nederland Terminal Evacuation Plan
3. Nederland Terminal Drainage Diagram

Sunoco Partners Marketing & Terminals L.P.
Nederland Terminal
Facility Response Plan

2300 North Twin City Highway
Nederland, Jefferson County, Texas

FRP ID Number: FRP-06-TX-00402

This Plan has been developed under the guidance of:
Appendix F 40 CFR Part 112 Facility Specific Response Plan

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APPENDICES

Documentation of Changes

Date	Changes Made	Page Numbers	Initials
11/20/2012	Plan Re-draft.	Entire Plan	RGH
1/15/2013	Updated Significant harm page and certification with signature	3 & 63	RGH
1/15/2013	Updated Vulnerability Analysis	20	RGH
1/22/2013	Hard copy submittal the MSU Port Arthur	-	RGH
2/13/2013	Included FRP-06-TX-00402	Cover pg	RGH
4/08/2013	Included Construction Date to Tank Schedule	16	RGH
7/2/2013	Expanded Detailed Discharge Scenarios	34,37,41	RGH
7/8/2013	Submittal to EPA	-	RGH

Certification of Annual Review

Date Plan Reviewed	Reviewer	Title

1.0 INFORMATION SUMMARY

1.1 Purpose of Plan

The purpose of this Spill Response Plan (Plan) is to provide guidelines to quickly, safely, and effectively respond to a spill. The Facility is owned and operated by Sunoco Partners Marketing & Terminals L.P. herein referred to as "Company."

This Plan is intended to satisfy the requirements of the Oil Pollution Act of 1990 (OPA 90), and has been prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and applicable Area Contingency Plans (ACP), Specifically, this Plan is intended to satisfy:

- U.S. Environmental Protection Agency (EPA) requirements for an OPA 90 Plan (40 CFR 112.20)
- U.S. Coast Guard (USCG) requirements for an OPA 90 Plan (33 CFR 154.1035)
- EPA requirements for a Spill Prevention Control and Countermeasures (SPCC) Plan (40 CFR 112.7)
- Occupational Safety and Health Administration (OSHA) requirements for emergency response plans (EAP and ERP) (29 CFR 1910)

A EPA/FRP Cross Reference Matrix is provided in **APPENDIX A**.

1.2 Facility Information

The Nederland Terminal is a bulk liquid, marine terminal located on the Neches River and handles crude and oil products for third party customers. Oil storage operations at the Nederland Terminal began in 1901. Growth and expansion of Terminal capacity has occurred since that time resulting in the current facility. Nederland Terminal is located on 1,100 acres and has tankage capacity to store 20 million barrels (bbl) of crude oil and 500,000 bbls of lube oil. The largest crude oil storage tanks within Sunoco Logistics Partners L.P., six 600,000 bbl and three 400,000 bbl tanks are located at this facility. his facility has 5 ship docks, three barge docks and rail car unloading facility. Vessels as rge as 120,000 dry weight tonnage (DWT) and 40 foot drafts can be moored at all ship docks. Nederland Terminal river frontage property line covers approximately 1.75 miles along the Neches River. All aboveground storage tanks are within secondary containment dikes that are designed to contain at least 110% of the largest tank's volume.

1.2.1 Facility Name and Location

Sunoco Partners Marketing & Terminals L.P. Nederland Terminal
2300 North Twin City Highway
Nederland, TX 77627
Phone (409)721-4881
Fax (409)729-9086

1.2.2 Location of the Facility

The facility is located at the following GPS Coordinates:

30 ° 00 ' 12 " North / -93 ° 58 ' 40 " West

1.2.3 Owner/Operator/Wellhead Protection

Sunoco Partners Marketing & Terminals L.P.
1818 Market Street, Suite 1500
Philadelphia, PA 19103
Wellhead Protection N/A

1.2.4 Qualified Individuals:

Qualified Individuals (QI's) for the Nederland Terminal and their contact information are presented in Table 1-1 below:

TABLE 1-1 – QUALIFIED INDIVIDUALS CONTACT INFORMATION

Name	Title	Phone Number	Response Time
Wayne Turner	Terminal Manager	409-721-4824 (Office) (b) (6) (Mobile)	1.5 hrs
E.M. Clark	Lube& Lab Supervisor/Security	409-721-4851 (Office) (b) (6) (Mobile)	0.5 hrs
Glenda Davalos	Crude Operations Manager	409-721-4839 (Office) (b) (6) (Mobile)	0.75 hrs
Stephen May	Maintenance Supervisor	409-721-4898 (Office) (b) (6) (Mobile)	0.5 hrs

1.2.5 Date of Oil Storage Start-Up:

Sunoco Partners Marketing & Terminals L.P. started operations in 1901.

1.2.6 Current Operation:

The Nederland Terminal is a bulk liquid, marine terminal located on the Neches River and handles crude and oil products for third party customers. Oil storage operations at the Nederland Terminal began in 1901. Growth and expansion of Terminal capacity has occurred since that time resulting in the current facility. Nederland Terminal is located on 1,100 acres and has tankage capacity to store 20 million barrels (bbl) of crude oil and 500,000 bbls of lube oil. The largest crude oil storage tanks within Sunoco Logistics Partners L.P., six 600,000 bbl and three 400,000 bbl tanks are located at this facility. This facility has 5 ship docks, three barge docks and rail car unloading facility. Vessels as large as 120,000 dry weight tonnage (DWT) and 40 foot drafts can be moored at all ship docks. All aboveground storage tanks are within secondary containment dikes that are designed to contain at least 110% of the largest tank's volume.

Nederland Terminal river frontage property line covers approximately 1.75 miles along the Neches River.
SIC Code # 4226

1.2.7 Certifications

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the information is true, accurate and complete.

Signature: G W Turner

Printed Name: G. W. TURNER

Date: 1-18-2013

Key Contact for Plan Development and maintenance, contact Russell Howerton, Sunoco Logistics, HES: (409) 659-8430.

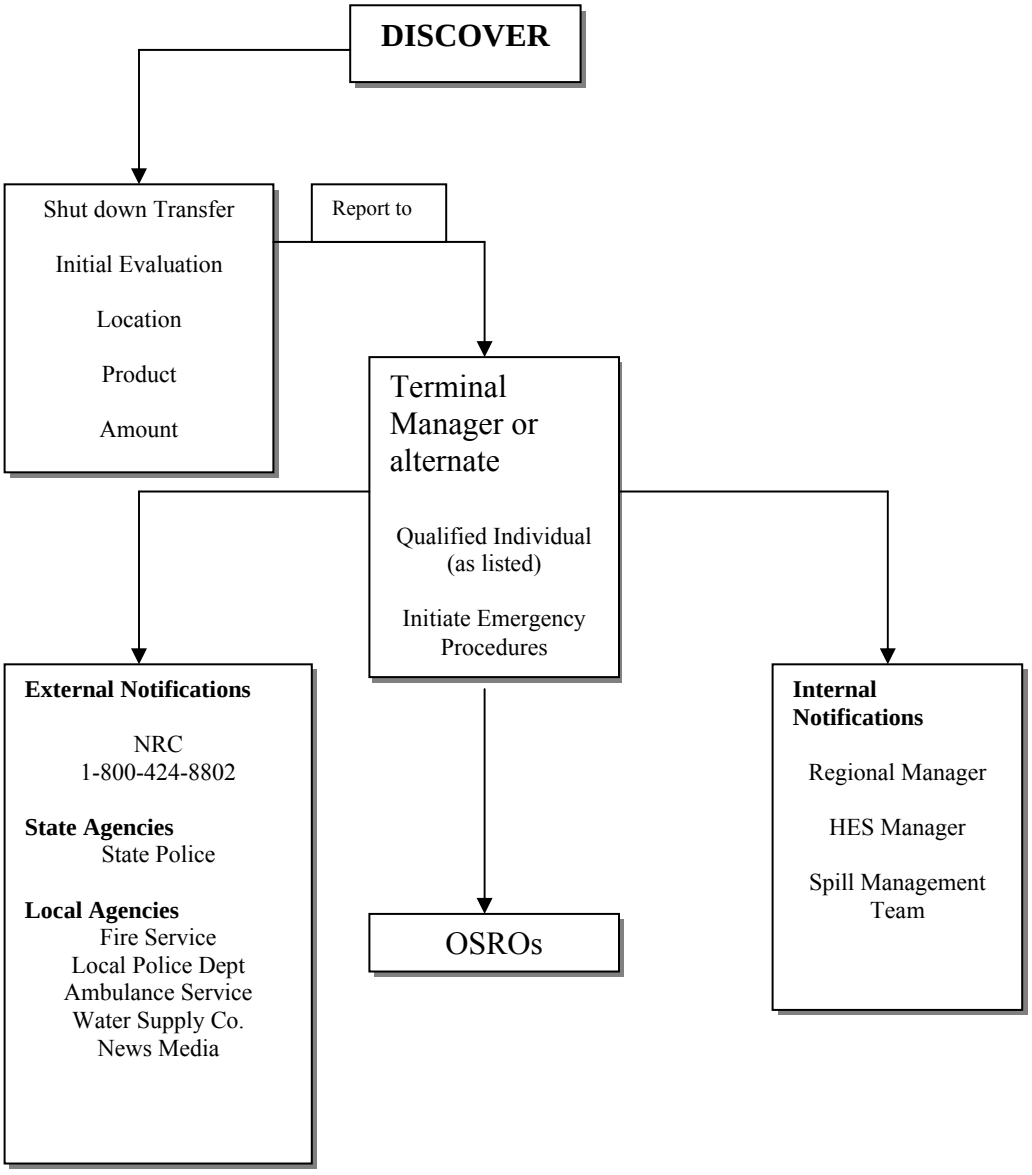
Procedure for Contacting the Facility on a 24 hour basis (409) 721-4881.

2.0 EMERGENCY RESPONSE INFORMATION

2.1 Notifications

Notification of an incident is required by law and will be carried out in accordance to the guidelines located in this plan. The Terminal Manager or alternate will conduct all initial notifications. A representative from the Health Environment, Safety and Security Department (HES&S) will assist in the notification process. The notification procedure will not be delayed due to a lack of specific information or compiling information about the incident.

Additional notification information is presented in **APPENDIX B**.



EMERGENCY NOTIFICATION PHONE LIST

Reporter's Name:_____ **Date**:_____
Facility Name: _____ **Phone:** (___) - _____ **Fax:** (___) - _____
Owner Name: Sunoco Partners Marketing & Terminals L.P.
Facility Identification Number: _____
Date and Time of NRC Notification:_____

All personnel listed as a responder for SXL has the required level of training in accordance with 29 CFR 1910-120. Training records are available upon request.

TABLE 2-1 EMERGENCY NOTIFICATION CONTACT INFORMATION

AGENCY NAME	TELEPHONE NUMBER
Federal Agencies	
National Response Center *****Any oil spill to navigable waters.*	800-424-8802 (24 hr Spill Reporting)
US Coast Guard MSO Port Arthur	409-723-6500
US EPA Region 6	214-665-6428 866-372-7745
US Fish and Wildlife Houston, TX	281-286-8282
U.S. Fish and Wildlife Service Region 2 Albuquerque, NM	505-248-6802
State Agencies	
Texas General Land Office (TGLO) *****Any oil spill that threatens waters of the Texas Gulf Coast. Report any discharge with the potential to impact state waters and/or any discharge originating in state waters.*	800-832-8224 (24 hr Spill Reporting)
Railroad Commission of Texas – District 3 Houston, Texas *****Any crude oil spill to water. Crude oil spills over 5 bbls.*	713-869-5001
Texas Commission on Environmental Quality Region 10 – Beaumont, Texas	409-898-3838
Texas Parks and Wildlife – Beaumont, TX	409-736-2551
State Police	512-873-3100
SERC	512-424-5677
Fire Marshall	512-305-7900
Local Agencies	
Jefferson County Sheriff	911 / 409-835-8411
Nederland Police Department	911 / 409-723-1518
Nederland Fire Department	911 / 409-723-1531
Jefferson County LEPC	409-835-8757
Oil Spill Response Organizations (OSRO's)	
Garner Environmental-Port Arthur, TX	409-983-5646/800-424-1716 (24hr)
Oil Mop LLC Port Arthur, TX	409-962-7226/800-645-6671 (24hr)
National Response Corporation	631 224-9141/800-899-4672 (24hr)

TABLE 2-1 Continued

AGENCY NAME	TELEPHONE NUMBER
Waste Management	
City of Nederland	409-723-1504
City of Port Neches	409-727-2181
Water Intakes	
Huntsman, Inc.	409-722-8381
Sunpol, Inc.	409-722-8321
Texas Eastern Pipeline Company	409-722-0291
Unocal/Chevron Oil Terminal	409-722-3441
Wildlife Rehabilitation	
Coalition, Inc. Houston, TX	713-468-8972
Gulf Coast Humane Society Corpus Christi, TX	512-225-0845
Wildlife Rehab and Education League City, TX	281-332-8319
Wildlife Rescue and Rehabilitation Unit Boerne, TX	210-698-1709
Weather	
National Weather Service Houston, TX	281-337-5074
National Weather Service Lake Charles, LA	337-477-5285
Hospitals	
CHRISTUS Hospital-St. Mary Port Arthur, TX 77642	409-985-7431
Medical Center of Southeast Texas Port Arthur, TX 77640	409-724-7389
Television Stations	
12 News KBMT (ABC Affiliate)	409-833-7512
6 News KFDM (CBS Affiliate)	409-892-6622
Fox 4 KBTV (FOX Affiliate)	409-840-4444

2.2 Spill Response Notification Form

Use this form prior to calling the National Response Center as the operator will ask for the following information. **Do not delay report to research information.**

(Example)

Reported By: _____

Record the Following for NRC Report: (800)424-8802 / (202)276-2675

Date:_____ Time:_____ Name of NRC employee who received the information:_____

Incident report number, assigned to this incident by NRC: _____

Person making report: _____Phone Number: _____

Position: _____ SXL Facility Name:_____

Responsible Party: _____

Date of Incident:_____ Time of Incident:_____

Description of incident (including distance & direction from nearest body of water); Use present location if a moving spill:_____

Oil name/ type of material involved:_____

Weather conditions on scene:_____

Estimate of amount of material lost and rate of release (if continuing): _____

Time and duration of the release: _____

Cause and circumstances of spill (should not be reported until verified unless that is no doubt or cause is obvious to public): _____

Facility Storage Capacity: _____bbls Location: Lat_____ Long _____

Description of area(s) likely to be affected, such as river, river bank, beach, wildfire area, or other properties; _____

Have there been any evacuations? _____

Actions being taken at the scene to contain spill, if any, and proposed cleanup measures:

_____

_____

_____

Agencies or persons already notified (or who will be notified): _____

_____

Personnel already on scene (or nearest to scene):_____

Contact person/telephone # (on or nearest to scene): _____

Existing and potential hazards of fire, explosion, etc., if any: _____

Personal injuries or deaths, if any:_____

Person(s) who discovered and/or are reporting spill:
Name:_____Phone: _____
Name:_____Phone: _____

Name of the operator: _____Address of the operator:_____

Completed and/or proposed actions to contain, cleanup and dispose of spilled material: _____

_____

Extent of containment of land, water, or air, if known:_____

_____

Other significant, unique or unusual circumstances known that are relevant to cause or extent of damage:

_____

_____

Follow-up notification should include:

Name of reporter:_____ Incident Number _____

Time /Date of discharge:_____

Location of Discharge: _____

Name of oil discharged: _____ Estimated volume: _____

Weather conditions on scene at the time of discharge and clean up operations: _____

_____

Actions taken by persons on scene:_____

_____

Actions planned by persons on scene: _____

_____

Any other changes in status of the incident over its duration: _____

_____

2.3 Response Equipment List

Emergency equipment is available to allow personnel to respond safely and quickly to emergency situations. Fire extinguishers are located throughout the facility and meet National Fire Prevention Association (NFPA) and OSHA standards. This equipment is maintained regularly and inspected on a monthly basis. In addition to the above mentioned equipment, the following emergency equipment is available:

TABLE 2-2 – FACILITY EQUIPMENT

Category	Type/ Model	Quantity	Size	Year Purchased	Operational Status	Location at Facility
Containment Boom	American Boom	7,500	18	2006-09	good	Reels at each Dock
Response Boat	Crestliner	1	18ft w/ 90 hp	2002	good	Firehouse
Response Boat	Weld-Craft	1	18ft w/ 115hp	1998	good	Firehouse
Response Trailer	Wells Cargo	1	24 Foot	1994	good	Firehouse

All other response Equipment will be supplied by the OSROs listed in Table 1-2. SXL requires an annual certification from each OSRO contracted by SXL to assure compliance with the PREP guidelines. A supply of sorbents and tools will be maintained on site for use on small spills and are replaced as needed.

Each listed OSRO has their own response equipment, a minimum of 1,000 feet of containment boom, absorbents, boats, and vacuum trucks. Lists of the OSRO's equipment resources may be found in their services contract. OSRO response equipment is inspected and refurbished after every use which is typically more than once a week. The primary OSRO's equipment is checked monthly or at a minimum of once every two months. Potential release of materials will be adequately handled. SXL has ensured by contract the availability of personnel and equipment necessary to respond, to the maximum extent practicable, to a worst case discharge or a substantial threat of such discharge at this facility.

2.4 Response Equipment Testing/Deployment

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	**Date of Last Update:**
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

All OSRO's listed in this plan (see Table 1-2) are rated as Level E for rivers & canals which requires at a minimum:

- **6,000 barrels/day recovery**
- **4,000 ft Containment**
- **22,000 ft Protective boom**
- **12,000 bbls temporary storage capacity**
- **Response time 54 hrs in high volume port 60 hrs for other locations**
- **Vessel response times 60 hrs for high volume ports 72 hrs for all other locations.**

2.5 Emergency Response Personnel

Emergency Response Personnel are listed in Table 1-4, below:

TABLE 2-3 – ERP CONTACT INFORMATION

EMERGENCY RESPONSE PERSONNEL			
Name/Title	**Contact Information**	**Response Time**	**Responsibilities During Response Action**
Wayne Turner Terminal Manager **Qualified Individual**	409-721-4824 (Office) (b) (6) (Mobile)	1.5 hrs	Incident Commander
E.M. Clark Lube& Lab Supervisor/Security **Qualified Individual**	409-721-4851 (Office) (b) (6) (Mobile)	0.5 hrs	Support Incident Commander
Glenda Davalos Crude Operations Manager **Qualified Individual**	409-721-4839 (Office) (b) (6) (Mobile)	0.75 hrs	Planning Section Chief
Stephen May Maintenance Supervisor **Qualified Individual**	409-721-4898 (Office) (b) (6) (Mobile)	0.5 hrs	Operations Section Chief
Brian Hudgins Operations Supervisor	409-721-4880 (Office) (b) (6) (Mobile)	0.5 hrs	Support or Relief Planning Section Chief
Curtis Kingston Safety Specialist	409-721-4886 (Office) (b) (6) (Mobile)	0.5 hrs	Safety Officer
Michael Everett Electrician	409-721-4897 (Office)	1 hr	Staging Group Leader
Ronald Page Maintenance	409-721-4899 (Office) (b) (6) (Home)	0.5 hr	Repair & Containment Group Leader
Justin Minter Environmental Compliance	409-721-4802 (Office) (b) (6) (Mobile)	1 hr	Environmental Liaison

TABLE 2-3 Continued

EMERGENCY RESPONSE PERSONNEL Continued			
Bill Wheeler Administrator Manager	409-722-0894 (Office) (b) (6) (Mobile)	1 hr	Logistics Section Chief
Jona Newton Scheduler Assistant	409-721-4823 (Office) (b) (6) (Mobile)	1 hr	Documentation Unit Leader
Tommy Wells Fire Chief	409-721-4800 (Office) (b) (6) (Home) (b) (6) (Mobile)	0.5 hr	Fire Suppression Group Leader
Brenda Theroit Accounting Assistant	409-729-2263 (Office) (b) (6) (Home)	0.5 hr	Accounting/ Procurement
Karen Carter Senior Accounting Clerk	409-729-2870 (Office)	1 hr	Accounting/ Procurement
Charles Green Maintenance	409-721-4899 (Office)	1 hr	Decon
Marshall Murphy Manager Right of Way	281-637-6415 (Office) (b) (6) (Mobile)	2 hrs	Claims/ Compensation
Misbah Tukdi Business Development	409-721-4822 (Office) (b) (6) (Mobile)	1 hr	Business Resumption
Acadian Ambulance Service Emergency Medical Group Leader	(409) 980-7702 (Office)	1 hr	Medical Group Leader

OSRO

OSRO's provide equipment and manpower to contain, remove and dispose of the spilled material. Most OSRO's will report to the Operations Chief during an incident.

Name	Response Time	Telephone Number
Garner Environmental	1 hr	(281) 930-1200
Oil Mop LLC	1 hr	(504) 394-6110
National Response Corporation		(631) 224-9141

Additional OSRO information is provided in **APPENDIX C**.

2.6 Evacuation Plans

In the event that an evacuation of the terminal and office building is required, the following procedures will be in effect: see Evacuation Diagram in **Appendix E.** Please note evacuation routes, assembly points, arrival routes and other pertinent information on the enclosed. Based on the extent of the incident, community evacuation plans will be implemented and followed as needed through local authorities.

Prior to Evacuation

a. Activate the emergency alarm/s,
b. Make pertinent emergency notification(s),
c. Quickly review product hazards,
d. Evacuees are to assemble at one of the two designated areas as instructed by the Incident Commander.

Refer to the specific emergency plan for the cause of evacuation (i.e. bomb threat, fire, spill, etc.) and take appropriate actions prior to the evacuation. Hazards imposed by spilled materials can include; fire, explosion, contamination and health related concerns.

Evacuation Action

a. Anyone in the terminal and office areas will evacuate the premises upon notification and will report to the primary assembly point (1),
b. If the primary assembly point is blocked due to the emergency or other circumstances, personnel are instructed to head up-wind, whether in vehicles or on foot.

At the Assembly Point

a. The incident commander or designated representative shall account for all persons known to be in the terminal.
b. Attempt rescue effort if necessary ONLY IF rescue can be done safely.
c. Confirm emergency notifications were made.

If the incident does not warrant complete evacuation of the facility, then the office building should be used as an alternative shelter. If needed, the local police, fire and emergency response contractors would be utilized to implement the local emergency evacuation plan for the general terminal locale. A mobile command center would be established as appropriate.

An example of an evacuation checklist is presented in Table 2-4:

TABLE 2-4: EXAMPLE EVACUATION CHECKLIST

EVACUATION CLECKLIST	
TASK	INITIALS
Request assistance from off-site agencies; convey Command Post's location	
Assemble personnel at predetermined safe location: upwind/up gradient of release (assembly area)	
Account for Company and contractor personnel	
Assess casualties (number/type/location)	
Determine probable location of missing personnel	
Secure site, establish re-entry point and check-in/check-out procedures	
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.)	
Monitor situation (weather, vapors, product migration) for significant changes	
Assist in developing a Rescue Plan if necessary	

2.7 Qualified Individual Duties

(A) Activate internal alarms and hazard communication systems to notify all facility personnel;
(B) Notify all response personnel, as needed;
(C) Identify the character, exact source, amount, and extent of the release, as well as the other items needed for notification;
(D) Notify and provide necessary information to the appropriate Federal, State, and local authorities with designated response roles, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee;
(E) Assess the interaction of the spilled substance with water and/or other substances stored at the facility and notify response personnel at the scene

of the assessment;

(F) Assess the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (i.e., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosion);

(G) Assess and implement prompt removal actions to contain and remove the substance release;

(H) Coordinate rescue and response actions as previously arranged with all response personnel;

(I) Use authority to immediately access company funding to initiate cleanup activities

(J) Direct cleanup activities until properly relieved of this responsibility.

3.0 HAZARD EVALUATION

3.1 Primary Activities and Potential Hazards

The primary activities of this terminal relevant to this section include:

* Receipt of petroleum products via pipeline delivery
* Storage of petroleum products in aboveground storage tanks.
* Transfer of petroleum products between storage tanks/ tank trucks/ barges.
* Processing of petroleum vapors.
* Operation of an oil/water collection system.

Potential hazards occurring in handling petroleum products are:

* Fire & Explosion
* Inhalation of vapors
* Contamination of surface waters
* Contamination of soils
* Contamination of groundwater

TABLE 3-1 TANK SCHEDULE

Tank No.	Shell Capacity (Bbls)	Working Capacity (Bbls)	Product Stored	Roof Type	Shell Const.	Date Built
131	55,000	55,000	**Out-of-Service**	IFR	R&W	1923
133	55,000	55,000	Crude	IFR	R&W	1923
200	80,000	80,000	Bunker Oil	Cone	W	1975
201	20,000	20,000	No. 2 Oil	Cone	W	1976
202	12,000	12,000	Med. Dist. Oil	Cone	W	1976
204	130,000	130,000	Crude	Cone	W	1978
205	130,000	130,000	Crude	Cone	W	1978
209	40,000	40,000	Bunker Oil	Cone	W	1981
1500	80,000	80,000	Crude	IFR	R	1926
1502	80,000	80,000	Naphtha	IFR	R&W	1926
1503	80,000	80,000	Crude	IFR	R&W	1927

1504	80,000	80,000	Crude	IFR	R&W	1927
1506	80,000	80,000	Waste water	Cone	R	1927
1507	80,000	80,000	Crude	IFR	R&W	1927
1508	80,000	80,000	Crude	IFR	R&W	1928
1509	80,000	80,000	Crude	IFR	R&W	1928
1510	80,000	80,000	Crude	IFR	R	1928
1513	55,000	55,000	Waste Water	IFR	R	1929
1514	55,000	55,000	Waste Water	IFR	R	1929
1515	82,000	82,000	Naphtha	IFR	R	1930
1516	82,000	82,000	Crude	IFR	R&W	1930
1517	82,000	82,000	Crude	IFR	R&W	1931
1518	118,000	118,000	Crude	IFR	R&W	1934
1519	118,000	118,000	Crude	IFR	R&W	1934
1521	118,000	118,000	Crude	IFR	R&W	1935
1522	176,000	176,000	Crude	EFR	W	1956
1523	176,000	176,000	Crude	EFR	W	1956
1524	176,000	176,000	Crude	EFR	W	1956
1525	176,000	176,000	Crude	EFR	W	1956
1526	176,000	176,000	Crude	EFR	W	1956
1527	176,000	176,000	Crude	EFR	W	1956

1529	250,000	250,000	Crude	EFR	W	1975
1530	250,000	250,000	Crude	EFR	W	1975
1531	250,000	250,000	Crude	EFR	W	1975
1532	250,000	250,000	Crude	IFR	W	1976
1533	250,000	250,000	Crude	IFR	W	1976
1534	250,000	250,000	Crude	IFR	W	1976
1535	150,000	150,000	Crude	EFR	W	1976
1536	150,000	150,000	Crude	EFR	W	1976
1537	200,000	200,000	Crude	EFR	W	1977
1538	200,000	200,000	Crude	EFR	W	1977
1539	200,000	200,000	Crude	EFR	W	1977
1540	200,000	200,000	Crude	EFR	W	1978
1541	600,000	600,000	Crude	EFR	W	1978
1542	600,000	600,000	Crude	EFR	W	1978
1543	400,000	400,000	Crude	EFR	W	1978
1544	400,000	400,000	Crude	EFR	W	1978
1545	400,000	400,000	Crude	EFR	W	1978
1546	660,000	660,000	Crude	EFR	W	2000
1547	200,000	200,000	Crude	EFR	W	1978
1548	250,000	250,000	Crude	EFR	W	1979
1549	250,000	250,000	Crude	EFR	W	1979

1550	250,000	250,000	Crude	EFR	W	1979
1551	660,000	660,000	Naphtha	EFR	W	2002
1552	660,000	660,000	Crude	EFR	W	2003
1553	250,000	250,000	Crude	EFR	W	1981
1554	660,000	660,000	Crude	EFR	W	2003
1555	250,000	250,000	Naphtha	EFR	W	1981
1556	600,000	600,000	Crude	EFR	W	2007
1557	400,000	400,000	Naphtha	IFR	W	2006
1558	500,000	500,000	Crude	EFR	W	2008
1559	600,000	600,000	Crude	EFR	W	2008
1560	600,000	600,000	Crude	EFR	W	2007
1561	600,000	600,000	Crude	EFR	W	2007
1562	600,000	600,000	Crude	EFR	W	2008
1563	600,000	600,000	Crude	EFR	W	2008
1564	600,000	600,000	Crude	EFR	W	2009
1565	600,000	600,000	Crude	EFR	W	2009
1566	600,000	600,000	Crude	EFR	W	2009
1567	600,000	600,000	Crude	EFR	W	2009
1568	600,000	600,000	Crude	EFR	W	2011
1569	600,000	600,000	Crude	EFR	W	2011
1570	600,000	600,000	Crude	EFR	W	2011

1571	600,000	600,000	Crude	EFR	W	2011
M-1	11,800	11,800	Lube Oil	Cone	R&W	1931
M-2	11,800	11,800	Lube Oil	Cone	R&W	1931
M-3	11,800	11,800	Lube Oil	Cone	R&W	1931
M-4	343	343	Lube Oil	Horiz.	R&W	1931
M-5	343	343	Lube Oil	Horiz.	R&W	1931
M-6	343	343	Lube Oil	Horiz.	R&W	1931
M-7	343	343	Lube Oil	Horiz.	R&W	1931
M-8	343	343	Lube Oil	Horiz.	R&W	1931
M-9	343	343	Lube Oil	Horiz.	R&W	1931
A	888	888	Lube Oil	Cone	R	#
B	226	226	Lube Oil	Cone	W	#
C	226	226	Lube Oil	Cone	W	#
D	59	59	Lube Oil	Cone	W	#
E	59	59	Lube Oil	Cone	W	#
F	1242	1242	Lube Oil	Cone	W	#
G	59	59	Lube Oil	Cone	W	#
H	59	59	Lube Oil	Cone	W	#
I	295	295	Lube Oil	Cone	W	#
J	421	421	Lube Oil	Cone	W	#
M-10	466	466	Lube Oil	Cone	W	1982

M-11	466	466	Lube Oil	Cone	W	1982
M-12	1,000	1,000	Lube Oil	Cone	W	1987
M-14	252	252	Lube Oil	Horiz.	W	1936
M-15	119	119	Lube Oil	Cone	W	1931
M-16	119	119	Lube Oil	Cone	W	1931
M-17	26	26	Lube Oil	Cone	W	1931
M-18	5,050	5,050	Lube Oil	Cone	R&W	1931
M-19	119	119	Lube Oil	Cone	R&W	1931
M-20	11,600	11,600	Lube Oil	Cone	R&W	1931
M-21	5,200	5,200	Lube Oil	Cone	W	1931
M-22	48	48	Lube Oil	Cone	W	1931
M-23	48	48	Lube Oil	Cone	W	1931
M-24	48	48	Lube Oil	Cone	W	1931
M-25	5,050	5,050	Lube Oil	Cone	W	1931
M-26	5,050	5,050	Lube Oil	Cone	W	1931
M-27	48	48	Lube Oil	Cone	W	1931
M-28	48	48	Lube Oil	Cone	W	1931
M-29	48	48	Lube Oil	Cone	W	1931
M-30	5,050	5,050	Lube Oil	Cone	W	1931
M-31	5,050	5,050	Lube Oil	Cone	W	1931
M-32	5,050	5,050	Lube Oil	Cone	W	1931

M-33	5,050	5,050	Lube Oil	Cone	W	1931
M-34	119	119	Lube Oil	Cone	W	1931
M-35	119	119	Lube Oil	Cone	W	1931
M-36	55	55	Lube Oil	Cone	W	1931
M-37	55	55	Lube Oil	Cone	W	1931
M-38	55	55	Lube Oil	Cone	W	1931
M-39	55	55	Lube Oil	Cone	W	1931
M-40	55	55	Lube Oil	Cone	W	1931
M-41	55	55	Lube Oil	Cone	W	1931
M-42	5,050	5,050	Lube Oil	Cone	W	1931
M-43	5,050	5,050	Lube Oil	Cone	W	1931
M-44	252	252	Lube Oil	Horiz.	W	1931
M-45	252	252	Lube Oil	Horiz.	W	1931
M-46	32,500	32,500	Lube Oil	Cone	W	1955
M-47	467	467	Lube Oil	Cone	W	1955
M-48	467	467	Lube Oil	Cone	W	1955
M-49	467	467	Lube Oil	Cone	W	1955
M-50	4,800	4,800	Lube Oil	Cone	W	1955
M-51	5,050	5,050	Lube Oil	Cone	W	1955
M-52	11,600	11,600	Lube Oil	Cone	W	1955
M-53	11,600	11,600	Lube Oil	Cone	W	1955

M-54	343	343	Lube Oil	Cone	W	1955
M-55	16,400	16,400	Lube Oil	Cone	W	1955
M-56	16,400	16,400	Lube Oil	Cone	W	1955
M-57	11,800	11,800	Lube Oil	Cone	W	1955
M-58	20,000	20,000	Lube Oil	Cone	W	1955
M-59	20,000	20,000	Lube Oil	Cone	W	1955
M-60	466	466	Lube Oil	Cone	W	1955
M-61	466	466	Lube Oil	Cone	W	1973
M-62	466	466	Lube Oil	Cone	W	1973
M-63	11,600	11,600	Lube Oil	Cone	W	1974
M-64	466	466	Lube Oil	Cone	W	1974
M-65	55,000	55,000	Cyclohexane	EFR	W	1976
M-66	28,500	28,500	Cyclohexane	IFR	W	1978
M-70	571	571	Lube Oil	Cone	W	1981
M-71	738	738	Lube Oil	Cone	W	1981
M-72	571	571	Lube Oil	Cone	W	1981
M-73	466	466	Lube Oil	Cone	W	1982
M-74	466	466	Lube Oil	Cone	W	1982
M-75	466	466	Lube Oil	Cone	W	1982
T-100	500	500	Steam Condst	Cone	W	1980
T-2	1,000	1,000	Boil Fd H20	Cone	B	1981

W-104	4,000	4,000	**Out-of-Service**	Cone	W	1979
W-105	2,000	2,000	**Out-of-Service**	Cone	W	1976
W-106	1,500	1,500	**Out-of-Service**	Cone	B	#
# Tank Build Dates Are Unknown.						
Gallons - 91,41,84,810 **Barrels - 21,766,305** **160 Tanks**						

3.2 Discussion of Facility Operations

This facility serves as a bulk liquid, marine terminal located on the Neches River and handles crude and oil products for third party customers. Oil storage operations at the Nederland Terminal began in 1901. Growth and expansion of Terminal capacity has occurred since that time resulting in the current facility. Nederland Terminal is located on 1,100 acres and has tankage capacity to store 21.7 million barrels (bbl) of crude oil and 500,000 bbls of lube oil. The largest crude oil storage tanks within Sunoco Logistics Partners L.P., six 600,000 bbl and three 400,000 bbl tanks are located at this facility. This facility has 5 ship docks, three barge docks and rail car unloading facility. Vessels as large as 120,000 dry weight tonnage (DWT) and 40 foot drafts can be moored at all ship docks. Nederland Terminal river frontage property line covers approximately 1.75 miles along the Neches River.

Day to day operational risks: A failure of the mechanical devices such as piping, valves, gaskets, pumps or meters may cause a release. Failure to follow loading procedures may lead to a release. Total quantity (barrels) and rate (barrels per hr) would be commensurate with the activity taking place at the time of a release. Dike areas are sufficient to contain a worst case discharge and provide adequate freeboard for rain to meet both state and federal regulations. Tanks are gauged before all deliveries and all deliveries are manned. All tanks are included in a regular inspection program.

Secondary Containment: Secondary containment for each tank area is designed to hold the entire contents of the largest tank plus sufficient freeboard to allow for precipitation. The containments are designed and constructed to be sufficiently impervious to allow spill cleanup, and to contain an oil spill of the largest tank.

In lieu of a storm water and freeboard calculation, a 110% volume containment design criteria was utilized in accordance with National Fire Protection Association (NFPA) guidelines. In some cases, where adequate containment

cannot be provided around a tank, adequate capacity is provided in the appropriate containment basin located near the tank. The storm water retention basins have manually operated gate valves that are not activated until after the plant operator has conducted a careful examination for oil. The plant operator notes the appearance of the water and monitors the drainage closely. After drainage is completed, the plant operator closes the valve.

Normal daily throughput: The average daily throughput for the Nederland Terminal is 465,000 barrels (19,530,000 gallons) per day.

3.3 Vulnerability Analysis

It is Sunoco Partners Marketing & Terminals L.P. position that any surface water is a sensitive receptor. In order to protect/minimize the impact of a release on surface waters all tanks are located within containment structures, and terminal loading racks are served by a collection sump that function as spill containment units. Our spill response strategy will include additional attempts to contain any released petroleum as close to our site as possible. Sensitivity maps from the Inland Area Contingency Plan were used to determine if any sensitive area(s) may be affected by a release. Topographic maps have been marked with the facility location and any known sensitive receptors. These are included in this plan. Additionally, evaluations of our facilities drainage pathway and appropriate on and off-site containment locations have been conducted in concert with our cleanup contractors. A facility drainage plan diagram is provided. The following features may be impacted by a spill:

TABLE 3-2 Features Potentially Impacted by Spills

Water Intakes:
There are two **municipal water intakes sites** fed by the LNVA within 15 miles of the rail road car storage area: **1.** City of Port Neches Water Intake-4910 Wilson St.-1.9 miles away. **2.** City of Groves Water Intake-601 Ave C-4 miles away. There are five **industrial water intake** sites within 15 miles of the Sunoco Marine Terminal. **1.** Chevron (Formally known as Unocal) - Neches River Site # 45 on Terry Boom Deployment Map #1 located in Appendix E **2.** Sunoco - Neches River Site # 46 on Terry Boom Deployment Map #1 located in Appendix E. **3.** Total Refinery (formally known as Fina) - Neches River Site # 33 on Terry Boom Deployment Map #2 located in Appendix E **4.** Motiva Enterprises Refinery - Neches River Site # 38 on Terry Boom Deployment Map #2 located in Appendix E. **5.** Huntsman Corporation C-4 Docks - Neches River Site # 39 on Terry Boom Deployment Map #2 located in Appendix labeled Additional
Schools: None affected.
Medical Facilities: None Affected
Residential Areas:

There are waterfront homes located at Neches River Site # 31 located on the map labeled as Terry Boom Deployment Map #2 in section 6.7 under sensitivity map section. Site # 31 is an inlet that has heavy recreational boat traffic and residential homes.
Businesses:
Chevron (Unocal), Port Neches Towing, Motiva Enterprises, Huntsman Corporation, and Total Refinery.
Wetlands or Other Sensitive Environments:
See appendix E-Sensitivity Maps
Fish and Wildlife:
Bessie Heights Marsh is ecologically rich with waterfowl and wildlife. A bird rookery is located approximately seven miles downstream of the dock facility. Also on Louisiana side of Sabine Lake is a National Wildlife Refuge that is rich in waterfowl and wildlife.
Lakes and Streams:
Several canals and bayous located along the north bank feed into the river. They include Gray's Bayou, Bessie Heights Canal, Star Bayou, Meyer Bayou, Bird Island Bayou, and Entergy Outfall Cut. Along the south bank there is Molasses Bayou, and Left & Right Prong Bayou feeds into the river.
Endangered Flora and Fauna: See Appendix I
Recreational Areas:
Port Neches Park and Rainbow Marina are used heavily for recreational boating.
Transportation Routes (Air, Water, Land):
There are several oil transfer facilities and refineries that line the Neches River that could suffer economic loss due to a large spill on the river. Chevron (Unocal), Port Neches Towing, Motiva Enterprises, Huntsman Corporation, and Total Refinery.
Utilities: None affected.
Other Applicable Areas: - -

3.4 Planning Distance

The Planning distance calculated using the Facility Response Plans Information Guide, US EPA August 1999, is provided below. Factors utilized include distance to the nearest body of moving water/storm sewer/drainage ditch or swale, geology, and topography of the area.

Intermediate Calculations

∞ = elevation (in feet) = [stream elevation @ facility] - [stream elevation @ receptor (or 20 mile point)]

ß = horizontal distance from facility to receptor (or 20 mile point) in miles

s = average steam slope = ∞/ ß / 5280

r = hydraulic radius (in feet) = average mid channel depth x 0.667

n = Manning's roughness coefficient from Table 1-7B

To calculate stream velocity (in ft./sec.), use: $v = 1.5/n \times r^{2/3} \times s^{1/2}$

Calculation of **PLANNING DISTANCE**
d = calculated planning distance (miles)
v = Chezy-Manning based stream velocity (ft./Sec.)
t = spill response time interval (from Table A)
c = 0.68 (sec-mile/hr-ft conversion factor)
d = *v* X *t* X *c* = planning distance equation

TABLE 3-3 SUBSTANTIAL HARM PLANNING TIME

Substantial Harm Planning Time (hrs) Port Areas as Identified in 40 CFR § 112	
Boston, MA	15
New York, NY	15
Delaware Bay and River to Philadelphia	15
St. Croix, VI	15
Pascagoula, MS	15
Mississippi River from Southwest Pass, LA to Baton Rouge, LA	15
Louisiana Offshore Oil Port (LOOP)	15
Lake Charles, LA	15
Sabine-Natchez River, TX	16
Galveston Bay and Houston Ship Channel	16
Corpus Christi, TX	16
Los Angeles/Long Beach Harbor, CA	16
San Francisco Bay, San Pablo Bay, Carquinez Strait, and Suisun Bay to Antioch, CA	16
Straits of Juan de Fuca from Port Angeles, WA to and including Puget Sound	16
Prince William Sound, AK	16
Others are specified by RA for EPA Region	16
Allow other lakes, rivers canals inland and near shore areas	27

TABLE 3-4 MANNING ROUGHNESS COEFFICIENT

Manning's Roughness Coefficient for Various Natural Stream Types (*n*)	
Minor Streams (Top width < 100 ft.)	
Clean:	
Straight	0.03
Winding	0.04
Sluggish (woody, deep pools	
No Trees/brush	0.06
Trees and/or brush	0.10
Major Streams (Top width > 100 ft.)	
Regular Section:	
No Boulders/Brush	0.036
Irregular Section:	
Brush	0.06

The following information is utilized to calculate the planning distance for each facility.

From USGS Quad/Topo Sheets

- Delineate watershed and down-gradient receptor streams for runoff/release
- Determine whether navigable water is within 0.5 miles of the facility (or would be in worst case storm/runoff scenario)

From Facility

- Identify alternate drainage pathways to navigable waters; namely storm drainage system/piping
- Establish list of soil or other factors effecting transport of oil over land

From Maps, Local/State Authorities or Investigation

- Identify fish/wildlife sensitivities and habitats in downgradient areas along with public drinking water intake locations
- Determine stream pool elevations at facility and at receptor points or at 20 miles downstream (maximum) for more distant receptors
- Characterize stream properties for accurate determination of roughness coefficient (*n*) and average mid-channel depth or hydraulic radius (*r*)

TABLE 3-5 TOTAL PLANNING DISTANCE - NEDERLAND TERMINAL

The barge loading facility is located on tidally influenced water. Therefore, in accordance with 40 CFR 112 Subpart D, the planning distance is **15** miles.	Nederland Terminal - Tidally Influenced - Ship Channel

3.5 Analysis of the Potential for an Oil Discharge

The probability of a spill occurring at this facility is minimal for the following reasons:

- Tanks are constructed in accordance with applicable engineering standards
- Tank age is reviewed as a potential factor
- Truck loading facilities are equipped with concrete pads with a spill collection drain system which returns spills to the recovery system
- All trucks are monitored during tank unloading procedures
- Product transfers are monitored and only conducted when facilities are manned
- Facilities are inspected frequently for evidence of corrosion and leaks according to applicable API standards
- Personnel are trained in procedures to prevent pollution
- The horizontal range of a spill is dependent upon the topography and distance to the nearest water body
- Natural disasters are not likely at these facilities; however, these facilities may experience flooding, tornadoes, or a lightning strike
- Company personnel prepare for natural disasters by monitoring weather reports and warnings and by taking appropriate safety precautions
- The potential for a natural disaster is acknowledged, as appropriate, during drills and exercises

3.6 Facility Reportable Oil Spill History

See facility reportable oil spill history in **Appendix H**.

4.0 DISCHARGE SCENARIOS

4.1 Discharge Scenarios Discussion

In order to adequately anticipate the resource requirements for each of the three spill scenarios, it is critical to identify the probable sources for each type of spill. This is particularly significant because the location of the spill is just as important as the size of the discharge in terms of manpower and equipment selection.

SMALL <2100 gallons released

Probable Source Selection

X	Pump Seal Leak	X	Line Rupture	X	Valve Leak
	Container Rupture	X	Loading Overfill		

MEDIUM >2100 to <36,000 gallons released

Probable Source Selection

X	Tank Truck Rupture	X	Valve Rupture	X	Line Rupture
X	Small Tank Failure	X	Loading Overfill		

WORST-CASE >36,000 gallons or 110% Volume Largest Tank

Probable Source Selection

X	Earthquake-induced Spills	X	Hurricane-induced Spills
X	Tornado-induced Spills	X	Catastrophic Tank Shell Failure
X	Tank Fire	X	Pipeline Manifold Rupture

4.2 Response Procedures for Each Scenario

The following are steps facility personnel or contracted personnel would follow to mitigate and respond to the worst case discharge, a medium discharge, and a small discharge:

1. Briefly assess the incident to determine the extent of discharge
2. Activate incident command structure
3. Perform emergency notification
4. Evacuate facility (if necessary)
5. Develop an action plan
6. Choose the necessary equipment to control the spill (1000 ft of containment boom within 1 hr)
7. Initiate spill control procedures
8. Initiate recovery operations
9. Surfactants are **prohibited** from being used on an oil spill in the water, and that dispersants can only be used with the approval of the Regional Response Team.
10. Arrange disposal of waste material. Recovery of any free product.

Soil contamination would be evaluated and remediation in concert with agency requests would be implemented. Free product would be collected via a vacuum truck and transported to an approved disposal facility (list provided in section 4 of FRP). For smaller spills, spill pads and other adsorbent material would be used to contain and collect free product. The adsorbent material would be placed in drums or roll off boxes for disposal at an appropriate facility.

11. The facility will utilize the Texas General Land Office, Texas Coastal Planning Response Toolkit to protect sensitive areas a respond to oil spills. The Toolkit contains a Texas Geographic Response Plan Index Maps/site specific tactical plans (response strategies). Examples of the Texas Geographic Response Plan Index Maps/site specific tactical plans (response strategies, booming points) are in **Appendix E.** The Toolkit is available on a CD or on the internet at http://gisweb.glo.texas.gov/atlas/masterpage.pdf

4.2.1 Small Discharges

Possible Scenario - the average most probable release of less than or equal to 2100 gallons could occur in the following situations:

Pump seal leaks

Pump seal leaks may occur when the mechanical or structural integrity of a pump fails. The maximum amount of product that could be lost through leakage is 500 gallons. The appropriate emergency response procedure would consist of:

1. Prompt closure of appropriate valves
2. Internal notifications and OSRO for vacuum truck services, dependent on volume.
3. External notifications.

After free product recovery from diked area, soil contamination would be evaluated and remediation in concert with agency requests would be implemented.

Line/Valve leaks

Line or valve leaks may occur when the mechanical or structural integrity of the equipment fails. A line leak would be visible immediately if a leak occurred in an aboveground section of line. Underground leaks may not be detected immediately unless a drop in pressure occurs or product comes to the ground's surface.

Leaks in aboveground lines and valves are minimized by daily inspections for signs of corrosion or weeps. If potential problems are detected, arrangements are made to take the subject line or valve out of service for repairs/replacement. Leakage of product would be into the surface of the ground.

The appropriate emergency response procedure would consist of:

1. Prompt closure of appropriate valves
2. Internal notifications and OSRO for vacuum truck services, dependent on volume.
3. External notifications.

Overfill at loading rack

It is possible that the an overfill of a bottom or top loading trailer could occur, though this is minimized due to the use of pre-set volume meters, Skully overfill protection, and the required presence of the driver. Any release would be less than 100 gallons of product. A release at the loading rack would be contained as spilled product would enter drains specifically located to receive spillage. The drains are tied into the terminal sewer system which leads to the separator.

The appropriate emergency response procedure would consist of:

1. Stop the flow of product by hitting the emergency stop switch.
2. Secure the rack and any other necessary area to prevent access by unauthorized persons.
3. Make appropriate internal and regulatory notifications and requests for services to emergency response contractors.
4. Any residual product on the concrete rack apron is washed into the separator.
5. Utilize an emergency response contractor's vacuum truck to pump accumulated product out of the separator.
6. If necessary, use absorbent material to clean up any residual petroleum from the concrete. Both on-site personnel and emergency response contractors would be utilized as needed.

Safety Precautions

In the case of any of the above mentioned SMALL probable source occurrences, Safety precautions would consist of measuring LEL and total volatiles prior to entering the affected area. If either reading precludes safe entrance, either the application of water spray would be used to knock down vapors or the local fire department would be contacted for application of a vapor suppressant.

Additional Considerations:

- Walk perimeter of site to evaluate/assess any effect on streams; adjacent properties.
- Safety considerations.

- Exposure evaluation.
- Refer to pre response planning map.
- Is volume and location such that it can be absorbed or flushed to the collection sump.
- Evaluate whether contaminated soils will need to be addressed

Detailed Small Scenario Discharge:
Quantity spilled: 150 gallons product type: crude oil spill cause: gasket failure at loading arm connecting to barge

1400 Line overpressure causes gasket at loading arm to fail. dockman secures dock valve and shore valves.

1402 Tankerman secures valve on barge.

1403 Transfer operations secured.

1404 Dockman notifies the control center of the spill as the tankerman tries to secure the spilled oil on the deck of the barge.

1438 The clean-up and repair coordinator arrives. area is tested for flammable and toxic gas concentrations. no dangerous levels are detected. clean-up crews are to wear flame resistant clothing with their normal rubber boots and gloves while working in the spill area. response personnel arrive at dock and man mooring boat to start deploying boom from the boom trailer.

1439 Tankerman secures the oil on the deck of the barge with sorbents.

1440 Clean-up coordinator takes charge of containment and clean-up operations and directs containment boom to be deployed around the entire barge.

1455 Agency notification is initiated by the foreman. agencies notified: national response center, us coast guard and state response centers. clean-up coordinator directs control center operator to notify outside spill clean-up contractor to respond with one vacuum truck, johnboat, wash pumps, and small waste containers.

1500 Notification to outside clean up contractor completed.

1525 Deployment of containment boom around barge is completed. spilled oil in the water is contained.

1600 Clean-up contractor arrives on scene and meets with clean up coordinator who advises of personnel safety equipment to be worn by clean-up personnel.

1605 Water clean-up operations starts using one johnboat, wash pump and vacuum truck to recover oil in the water. Sorbents are used to clean the deck of the barge.

1630 Federal (USCG) and state (GLO) agencies arrive on scene and review the incident with those involved and monitor clean-up operations.

1800 Clean up operations are completed. All oily debris is collected in water tight containers and prepared for transportation to a certified land fill. All free liquid recovered by vacuum truck is discharged into the district tankage system.

1830 Clean-up site is reviewed by regulatory agencies and is determined to be satisfactory. Containment boom is removed and loading operations are allowed to resume.

1900 Company spill reports and regulatory reports are completed.

1910 End of response.

4.2.2 Medium Discharges

Possible Scenario - a maximum most probable release of greater than 2100 gallons but less than 36,000 gallons could occur in the following situations:

Line/Valves

Aboveground line or valve ruptures may occur in an area where lines/valves are not contained. Pressure relief valves/gauges in the rack manifold area may rupture during loading because of vibrations caused by pumps. In this case, the break would be noticed immediately during the loading. Each line has a few valves so that a loss could be minimized by prompt closure of other valves (at the terminal). The appropriate emergency procedures would include the following:

1. Close the appropriate valves to minimize loss.
2. Make internal notifications and contact OSRO(s).
3. Complete external notifications.
4. Designate command center.

An assessment of threat to environmentally sensitive areas would be made and protective measures would be performed as needed. Portable tanks would be arranged for to store recovered product.

Small tank failures

Small tank failures would result in spilled product being retained within dike area. Area would be secured; proximity to load rack would prohibit any loading. The following emergency response actions would be taken.

1. Operator will verify that dike drains are in a closed position.
2. Secure the area to prevent access by unnecessary or unauthorized person.
3. Make internal notifications.
4. Contact OSRO/Emergency response contractors for vac truck and other necessary sources.
5. Make appropriate agency notifications.

6. Inspect tank farm perimeter to ensure integrity of dike.
7. Use vacuum truck(s) to recover contained product.

If the product is clean enough, it would be reintroduced into storage. Otherwise, recovered material will be disposed of off-site at an approved facility. After recovery of all products, timely evaluations of any further response actions will be made.

Overflow of Storage Tank

An overflow of a storage tank within the tank farm could occur due to a failure of a high level alarm system. Secondary containment areas are more than adequate, so product would be contained within the diked area. Product would be released at approximately 1,500 bph resulting in a maximum spill of 200 barrels. In addition to the procedures listed above (small tank failure), this situation would warrant the following:

1. Immediately notify the pipeline of the overflow so that receipt could cease.
2. Recovery activities identical to those in Small Tank Failure would be followed.

Tank Truck Rupture

Tank truck rupture could result in the loss of a maximum of 9,000 gallons. If this were to occur on site, the containment/ emergency response would be essentially identical to that of a release/overfill at the rack (see above). The product would be contained in the collection sump, and the emergency response would be identical.

Safety Precautions

In the case of any of the above mentioned MEDIUM probable source occurrences, measurements of both LEL and volatile petroleum vapors will be taken to determine necessary PPE. If LEL/vapors are such that safe entry cannot be made either a light water spray will be applied to the pooled petroleum or the local fire company will be requested for a vapor suppressant foam application.

Post-incident review will be conducted to establish causes and develop corrective/preventative measures.

Additional Considerations:

1. Safety.
2. Exposure.
3. SXL tankers for recovered product.
4. Perimeter tour to assess off-site impacts.
5. Verify dike drains closed
6. Can spill be dammed up.

7. If stream has been impacted install booms or if appropriate underflow dams - refer to pre response plan maps.
   Impacted soils need removal.

Other Factors Affecting Response Efforts

1. Proximity to down gradient wells, waterway and water intakes
2. Proximity to fish, wildlife and sensitive areas
3. Likelihood that the discharge will travel offsite
4. Location of Spill
5. Material Discharged
6. Weather or Aquatic Conditions
7. Available Remediation Equipment
8. Probability of chain reaction failures
9. Direction of Spill Pathway

Detailed Medium Discharge Scenario:

Time of Spill: 1030 Hrs
Source: Storage Tank
Quantity Spilled: 2,500 Gallons
Product Type: Lube Oil
Spill Cause: Failure of High Level Alarm on Tank #M-3

Scenario: at 1000 hrs operators starts the transfer of lube oil from tank #m-1 to tank #m-3 with a 16,800 gallon per hr pump. The transfer will take five hrs to complete and the gauger leaves to work in another area. At 1100 hrs. The gauger returns to check the pump and discovers oil spilling on the ground around tank #m-3.

1100 Gauger reviews the spill area and checks the levee (secondary containment) drain to ensure the line is closed.

1102 Containment area drain is confirmed to be closed. Operator checks area for potential fire and safety hazards. Gauger shuts the pump down and closes the valve on the pump and discovers that the high level sensor on the tank has failed.

1103 Gauger notifies the Nederland emergency communication center (ECC) that a spill has occurred in the lube tank farm and oil has entered secondary containment.

1104 ECC activates the terminal emergency notification system siren to notify plant personnel that an emergency has occurred and radio/telephone paging to notify the key emergency response personnel.

1106 Clean up and repair coordinator (CRC) arrives at the spill site and dispatches personnel to confirm close status of all discharge valves leading away from spill area. Free board remaining inside tank containment area is estimated.

1107 Safety/fire officer arrives on scene and test area for flammable and toxic gas concentrations. None are detected due to the nature of the product. Nomex, rubber boots and gloves are ordered to be worn as a precautionary measure.

1108 Discharge valves in spill area are confirmed to be closed.

1112 Company vacuum truck starts recovery of oil.

1120 Regulatory agencies are notified by on-scene director (OSD). National response center, state response center and the Texas Water Commission are notified.

1130 Discharge cleanup organization (DCO #1) is notified to respond with vacuum trucks, small waste containers, shovels and manpower.

1145 Oil from overfilled tank is pumped back into tank #m-1 to bring the level in tank #m-3 to normal operating level.

1150 The two tanks involved are gauged to account for oil spilled. Oil shortage is 8,400 gallons.

1200 Regulatory agencies arrive on scene and review spill cleanup operations with responsible party.

1230 DCO #1 arrives on scene with equipment and personnel.

1240 CRC advised DCO #1 on material spilled required safety equipment to be worn and where to stage clean up equipment.

1300 Clean up operations are started. Vacuum trucks are staged at the spill source site.

1400 Oil recovery by vacuum trucks is discharged into the terminal waste water treatment system tankage.

1500 Water washing of spill site is conducted using terminal fire water system and fire hose. Remaining oil is washed down to containment sites and recovered by vacuum trucks and discharged into the terminal waste water treatment system. Oily debris, and grass are collected from the spill site and disposed of in approved waste containers for disposal in a permitted landfill.

1730 Sorbent booms are deployed around spill site to collect any residual oil.

1800 Clean up is reviewed by company and regulatory agencies and approved.

1820 Company and regulatory spill reports are completed.

1825 End of response.

4.2.3 Worst Case Discharge

Based on the EPA worst case discharge volume, a multiple tank facility acts as one storage unit unless evidence is shown to contradict this idea.

The worst case scenario at Sunoco Nederland Terminal may occur in the following situations:

Catastrophic tank failure

A catastrophic failure of a tank could result in an unknown percentage of the total volume of product escaping the containment area either due to wave effect or a breach of the dike wall. Detection of an incident of this nature would result in the enactment of the following emergency procedures:

1. Make internal notifications.
2. Contact Emergency Response contractors (OSROs), so that material containment and recovery can be initiated.
3. Notify appropriate agencies to activate Area Contingency Plan.
4. Call emergency management agencies and police if applicable, to initiate evacuation of residents down gradient of the failed tank.
5. Request portable tanks by contract if needed. Recovered product may also be returned to product tank if clean or be trucked to slop tanks.
6. A preliminary reconnaissance will be conducted so that specific response needs can be established. Such as swales, small streams will be dammed or boomed to contain product.

Tank Fire

The Nederland Terminal has local fire response arrangements with the local fire departments, either for foam application and/or cooling of adjacent tanks. In the event of a tank fire, fire fighters from neighboring municipalities will respond. As a back-up to all the above, SXL has a national contract with Chubb National Foam for supplying foam for a major tank fire. SXL has a national contract with Williams/Boots & Coots (Houston, TX) for application of foam and any other major fire response activities.

Pipeline Manifold Rupture

A pipeline manifold rupture can result in a land-based spill. This would occur until personnel were able to close the terminal and tank valves. The following emergency response procedure would be followed:

1. Immediately notify Pipeline so that receipt could cease.
2. Notify the National Response Center and make internal notifications.
3. Notify emergency services for fire fighting and evacuation services, if appropriate.
4. Contact OSROs for spill response and containment.
5. Notify external agencies.

6. Bring in SXL staff from Philadelphia and/or other facilities for environmental assessment, public relations, site safety, etc.
7. Arrange the following services including but not limited to: emergency lighting, portable tanks, and portable sanitary facilities.
8. Bring in NRDA contractors.
9. Request portable tanks by contract if needed. Recovered product may also be returned to product tanks if clean or be trucked to slop tanks.

Safety Precautions

In the case of any of the above mentioned WORST CASE probable source occurrences, safety precautions identical to those explained in the MEDIUM probable source occurrence would be followed.

Additional Considerations

* Safety considerations due to ignitability/flammability of petroleum remove sources of ignition, ground recovery equipment; monitor LEL continuously.
* Establish hot and safe zones based on LEL and Benzene inhalation standards.
* Arrange for empty SXL tankers and tanks for recovered product storage; arrange transport to refinery or TSDF/Recycler.
* Daily status/planning meetings to assess effectiveness of recovery program.
* Establish extent of impact –
* Notify refinery wastewater treatment personnel if product in refinery sewers.
* Verify no impact on sanitary sewer system.
* Establish containment methods/ devices - in surface water boom below. Refer to pre-response planning maps for boom, dam etc. locations.

Other Factors Affecting Response Efforts

1. Assuming catastrophic tank and dike failure
2. Proximity to down gradient wells, waterways and water intake.
3. Proximity to fish wildlife and sensitive areas. Sensitive areas are identified in the attached figures.
4. Likelihood that the discharge will travel offsite.
5. Location of spill.
6. Material discharged.
7. Weather or aquatic conditions.
8. Available remediation equipment.
9. Probability of chain reaction failures.
10. Direction of spillway.

Detailed Large Discharge Scenario:

Scenario #3: 36" Dock line Failure While Unloading Vessel - EPA Worst Case Scenario
Quantity spilled: 9500 bbls.
Product type: Crude oil

Spill cause: tank dike partially filled with rain water. Approximately 300,000 bbls crude oil escapes dike area and is flowing into storm drainage collection areas. Some oil has reached the river by way of a storm water ditch. The spill has impacted both soil within the dike area, in storm water ditches, and storm water collection areas and surface water (river). Rain is falling. Winds are blowing from south at 20 mph.

0750 Spill begins.

0800 Operator discovers spill during routine monitoring of tank levels.

0802 Operator notifies Nederland emergency communication center (ECC) by radio.

0804 Operator and central control begins to secure incoming transfers to tanks.

0805 ECC activates the terminal emergency notification system siren to notify plant personnel that an emergency has occurred and radio/telephone paging to notify the key emergency response personnel.

0815 Cleanup and repair coordinator (CRC) arrives at spill site and establishes incident command post site.

0820 Crisis control center coordinator (CCCC) establishes crisis control center.

0820 On-scene director (OSD) notifies first discharge cleanup organization (DCO#1) response personnel boats, booms, pumps, blowers, vacuum trucks, personnel, are requested.

0824 Central control completes securing of incoming facility transfers and begins to determine volume of oil spilled using material balance calculations.

0825 ECC notifies industrial and municipal water intake facilities of potential spill impact.

830 Terminal response personnel are briefed on the situation, provided safety information, and receive instruction for deployment.

0840 OSD notifies local, state and federal agencies. Estimate volume of spill reported as 500,000 barrels.

0845 OSD has crisis control center personnel arrange a helicopter for flight inspection of spill by OSD, CRC, and DCO.

0845 CRC returns to spill site to assess spill site conditions, hazards, and advises NC of additional support requirements.

0850 Health, safety and security advisor (HSSA) arrives on site and begins health and safety monitoring. Vapor monitoring indicates no hazard present. Nomex, rubber boots, and gloves required as minimum protection for workers.

0900 Terminal response personnel begin response activities to contain the spill. At the direction of the OSD and CRC, construction of diversion trenches, dames in storm ditches, and the deployment of diversion booms to contain/control oil migration to the river are initiated. Deployment of containment boom in the river is initiated.

0905 CCCC contacts dco#2 and places them on standby.

0908 CCCC places order with local waste disposal company for 20 yard roll-off containers to be delivered to spill site.

0925 OSD arrives at spill site assesses site conditions (weather, river stage, and spill trajectory).

0930 DCO#1 response personnel arrive at spill site with containment boom, boats, vacuum trucks, and cleanup equipment.

0935 OSD, CRC, DCO, and HSSA meet to discuss site safety plan and schedule safety meetings with cleanup personnel. Appropriate protective equipment and clothing is required.

0950 OSD requests additional personnel and equipment be called out by dco#1.

0955 company response personnel arrive onsite, setup command post and begin to deploy containment boom for containment as directed by the OSD and CRC and clean up foreman.

1015 federal and state regulatory agencies arrive on scene and review spill site conditions and initial response activities with OSD. Volume of spill is downgraded to 3000 barrels based on the gaugers calculations.

1040 helicopter arrives on site and picks up OSD, CRC, and agency representatives to determine extent of oil migration.

1050 OSD in helicopter reports leading edge of spill is largely located near the north east bank due to the high winds. The contact with the marshy shoreline is affecting the speed at which the oil is spreading. OSD directs CRC by radio to

request additional DCO boats with boom will be launched from a convenient location downstream to intercept leading edge of spill.

1055 CRC contacts DCO#2 and requests that boat crews with booms launch downstream and proceed up river to deploy deflection booms at locations downstream of leading edge of spill.

1120 OSD arrives back at crisis control center and updates western area management and notifies corporate management.

1130 DCO#2 boats are launched downstream and proceed up river.

1230 At the request of the OSD, the crisis control center coordinator (CCCC) notifies wildlife rehabilitation organizations of potential wildlife impacts.

1300 DSC, CRC, DCO personnel and agency representatives meet to discuss cleanup plans as follows:

-Priority for protection given to environmentally sensitive areas, if any.

-Manpower and equipment needs are assessed to perform clean up operations. Work boats and barges will be required because access from shore is impractical. Portable pumps, skimmers and containment vessels will be needed to recover and transfer liquids and oily debris.

-Terminal barge dock will be utilized to off load recovered liquids and debris from work barges.
-vacuum trucks will dispose of recovered liquids into nearest company station tankage.

-Cleanup methods are reviewed with regulatory agencies. Methods to minimize damage to the shoreline and marsh areas by personnel and equipment will be utilized, water flushing and cutting grass at the water line and not total grass removal, personnel working from skiffs and not walking in low tidal areas.

-Procurement of equipment will be coordinated through the crisis control center support staff personnel by the CRC.

-Coordination on all spill site operations will be communicated through CRC to the on OSD. - clean up progress and volume of oil recovered will be reported to the OSD every four hrs or as needed.

-All cleanup operation communications will be conducted and controlled through the on-site command post and the ECC.

-All safety, emergency and accident reporting will be coordinated through the HSSA.

-All external reporting and press releases will be handled by the OSD and all inquires should be referred to the crisis control center.

1330 CCCC provides public relations advisor with information for press release.

1500 HSSA holds informational safety meeting with clean up coordinator and contract clean up personnel. Safety factors in clean up operations and reporting channels are reviewed.

1515 Two work barges, boats and portable pumps are contracted from local ship yards and barge companies. Arrival time is 0700 hrs next morning.

1530 Public relations advisor faxes draft press to CCCC for telephone review and approval by OSD.

1600 Press release is approved and released by public relations advisor.

1630 additional waste disposal containers are ordered by the CCC staff be delivered for use on equipment barges.

1830 Deflection booms in place protecting sensitive areas and directing spill toward collection sites along shore.

1930 Lights are setup at Nederland to continue pickup operation around the facility through the night. A boat crew will monitor the boom locations in the main body of the river through the night. Cleanup away from Nederland terminal will be commenced at 0700 next day.

Cleanup will continue according to the plan until the area is acceptable to the DSO federal agencies. Final cleanup measures will include washing down of shorelines unless burning or non-treatment are determined to be less damaging and the use of solvent to collect any oily film. Internal and regulatory agency reports will be completed and disposal of oily debris completed. When the response and clean-up activities have been completed the OSD conducts a post incident review to evaluate the effectiveness/adequacy of spill response activities and effectiveness of the oil spill response plan.

End of scenario.

4.3 Discharge Volume Calculation

The Worst Case Discharge was formulated assuming a release from the Marine Transportation Related portion of the Facility, as directed by 33 CFR 154.1029.

The Worst Case Discharge is based on a catastrophic failure of all piping carrying oil between the marine transfer manifold(s) and the non-transportation related portion(s) of the Facility. For the Nederland Terminal, this volume is calculated as noted below. Actual Worst Case Discharge volumes for all facilities are provided

in **TABLE 4-1**. Oil spill response equipment available to respond to this spill is included in **SECTION 2.3.**

Worst Case Discharge (WCD) = [(maximum time to discover + maximum time to shutdown flow) x maximum flow rate] + piping capacity = [(**0.19** hrs) x **50000** bbls/hr] + **0.05** barrel = **9500.05 barrels**.

Average Most Probable Discharge
The Average Most Probable Discharge (AMPD) is defined by 33 CFR 154 as the lesser of 50 barrels or 1% of the Worst Case Discharge. One percent of the Worst Case Discharge is approximately **95** barrels; therefore, the average most probable discharge is **50 barrels**.

Maximum Most Probable Discharge
The Maximum Most Probable Discharge (MMPD) is defined by 33 CFR 154 as the discharge of the lesser of 1,200 barrels or 10% of the volume of the Worst Case Discharge. Ten percent of the Worst Case Discharge is approximately **950** barrels; therefore, the maximum most probable discharge is **950 barrels**.

The WCD for the EPA portion of the facility, as defined in 40 CFR 112, Appendix D, Part A, is calculated as:

- For multiple tank facilities with adequate secondary containment, the WCD is calculated as the capacity of the largest single aboveground oil storage tank within an adequate secondary containment area or the combined capacity of a group of aboveground oil storage tanks permanently manifolded together, whichever is greater.

Based on this definition, the EPA WCD would be equal to the potential contents of the largest tank. At the Nederland Terminal, Tank #'s 1546, 1551, 1552 and 1554 are the largest tanks at 660,000 bbls, each.

TABLE 4-1 USCG WORST CASE DISCHARGE VOLUMES IN BBLS

USCG			**USEPA**
WCD	Avg. Most Probable	Max. Most Probable	
9500.05	**50**	**950**	**660,000**

Because the discharge for the EPA portion of the facility is greater than the USCG definition for a worst case discharge, response resources are planned for the greater of the two volumes.

4.4 Discharge Detection System

Detection of a discharge from a pipeline system may occur in a number of ways including:

- Detection by the pipeline Control Center Supervisor (CCS)
- Visual detection by Company field personnel or pipeline patrols
- Visual detection by the public

The pipeline systems are controlled and monitored by a SCADA system located in Sugarland, Texas. This system provides the Control Center Supervisors access to pertinent information regarding oil movements, pressures and equipment status and control.

Remote Detection

The pipelines are equipped with pressure and flow monitors, which exercise local control and transmit data to the control center. These systems are set to alarm or shut down on preset deviations of pressure flow. In case of an alarm, control center personnel will take the appropriate actions in accordance with standard operating procedures. A summary of the operating procedures is provided below.

Trained personnel in the control center will monitor the SCADA system for the following parameters:

- Flow rates
- Pressure
- Valve positions

AVAILABILITY - ALL LINES

Operating Procedures for the Remote System

- **SCADA System 10-Second Data Access**
  The control center personnel monitor and control pipeline operations with the SCADA system in the Pipeline Control Center. The ultimate decision on leak detection lies with the Pipeline Control Center.

AVAILABILITY - ALL LINES

- **Communication Flexibility/Redundancy**
  The Company's SCADA system acquires data via a satellite network. Satellite communications allow large volumes of data to be transmitted both to and from all field locations very rapidly. Network configuration and transmission protocols provide the flexibility to establish guaranteed delivery transmissions as required. Communication system redundancy provides accurate and reliable data to pipeline controllers.

AVAILABILITY - ALL LINES

- **Parameter Alarms**
  A parameter alarm is a data value limit (high or low) which can be set by the Pipeline Controller to alert upset conditions regardless of whether the Operator is actively monitoring the data point in question. Controllers are required to establish parameter alarm settings on mainline pressures and flow rates for all operating line segments. In combination with ten-second data acquisition rates, parameter alarms provide near instantaneous notification of potential upset conditions on all operation mainlines.

AVAILABILITY - ALL LINES

- **Trending**
  The SCADA system includes a trending capability which graphically displays pressures, temperature, and flow rate data for each mainline pump and oil receiving location on the system. This system can provide valuable insight into operations history and can help the controller proactively address potential upset conditions.

AVAILABILITY - ALL LINES

- **Tank Gauging with Parameter Alarms**
  Tank gauge data is available to Pipeline Control for use by pipeline controllers. Company systems are gauged automatically by the SCADA computer and the data is made available to the pipeline controller on demand. Parameter alarms (see above) are also available for tank levels, to ensure no potential tank discharge.

AVAILABILITY - ALL LINES

- **Training**
  All pipeline controllers are compliant with Operator Qualification requirements established in 49 CFR 195 Subpart G.

<u>Visual Detection by Company Personnel</u>

Aerial patrol flights will be made 26 times a year not to exceed 21 days apart. If unable to fly, area personnel will walk or drive the right-of-way. The intent of the patrol is to observe the area within the vicinity of the pipeline right-of-way for leaks, exposed pipes, washes, and other unusual conditions. Construction activity on either side of the pipeline right-of-way is also monitored. Discharges to the land or surface waters may also be detected by Company personnel during regular operations and inspections. Should a leak be detected, the appropriate actions are taken including but not limited to:

- Notifications as per **TABLE 2-1**
- A preliminary assessment of the incident area
- **If appropriate, initiate initial response actions per TABLE 8-1 of the Facility Response Plan**

TABLE 8-1 of the Facility Response Plan provides an example checklist for initial response actions.

Visual Detection by the Public

Right-of-way markers and signs are installed and maintained at road crossing and other noticeable points and provide a 24-hr number for reporting emergency situations. The Company also participates in the "call before you dig" or "One Call" utility notification services which can be contacted to report a leak and determine the owner/operator of the pipeline. If the notification is made to a local office or pump station, the Company representative receiving the call will generally implement the following actions:

- Notify the Pipeline Control Center and region/designated office
- Dispatch Company field personnel to the site to confirm discharge and conduct preliminary assessment
- Notify their immediate supervisor and provide assessment results

Pipeline Shutdown

If any of these situations are outside the expected values, abnormal conditions are considered to exist. If abnormal conditions exist, Pipeline Controller will take the appropriate actions to ensure that a release does not occur. If a discharge has occurred, Pipeline Control will take actions to limit the magnitude. In either case, appropriate actions taken by Company personnel could include, but are not limited to:

- Shut down affected line segment if there is an indication of a leak
- Isolate line segment
- Depressurize line
- Start internal and external notifications
- Mobilize additional personnel as required

4.5 Discharge Detection by Personnel

SXL employs a phased inspection program to ensure the integrity and safety of each facility. The phased inspection program consists of daily visual inspections, monthly inspections, and detailed inspections. Repairs are made, as necessary, on all tanks and equipment. If a spill is detected, facility personnel will follow the notification procedures found in Section 1.3.1 of this plan.

Daily Inspections

An integral function of the Terminal Operations is a daily visual inspection of the

facility. Loading racks, flexible hoses, dikes, indoor storage areas, and vapor treatment unit, are inspected daily for the following, where applicable:

* pipes, pumps, valves, and fittings for leaks;
* tanks, seams, and supporting structures for deterioration;
* containment areas for deterioration;
* alarm and communication system for operability; and
* safety equipment for malfunctions.

Should the inspection note any situation that warrants remedial action, corrective action will be initiated immediately. Any unusual occurrences are recorded in the daily log book.

Monthly Inspections

The Terminal Operations Manager routinely coordinates monthly inspections of the entire facility. An in-depth review of the following areas is conducted:

* safety equipment,
* emergency equipment,
* housekeeping procedures,
* maintenance procedures,
* safe job procedures,
* potential unsafe conditions,
* integrity of tanks and equipment,
* condition of the vapor treatment unit.

Upon completion of the inspection and review, the manager will develop a list of recommended changes as required. These recommendations will result primarily from one of the following factors:

* decrease in containment or equipment efficiency,
* potential hazard to human health,
* potential endangerment to the environment, or
* potential hazards associated with changes to the facility or operational procedures.

Inspection item checklists are used for monthly inspections and records are maintained at the terminal.

Detailed Inspections

A detailed inspection of the entire facility is conducted periodically. This inspection includes taking storage tanks out of service for inspection and maintenance. The following areas are addressed:

* shell thickness;
* tank corrosion, scouring and bulging;
* tank seams;
* pipe connections;
* level indicators

* pipe leaks, corrosion, and pitting;
* valve leaks, corrosion, and cracks;
* flange corrosion, leaks
* tank supports.

Any problems found are corrected promptly, and detailed annual inspection reports are prepared for submittal to Area Operations Manager.

5.0 PLAN IMPLEMENTATION

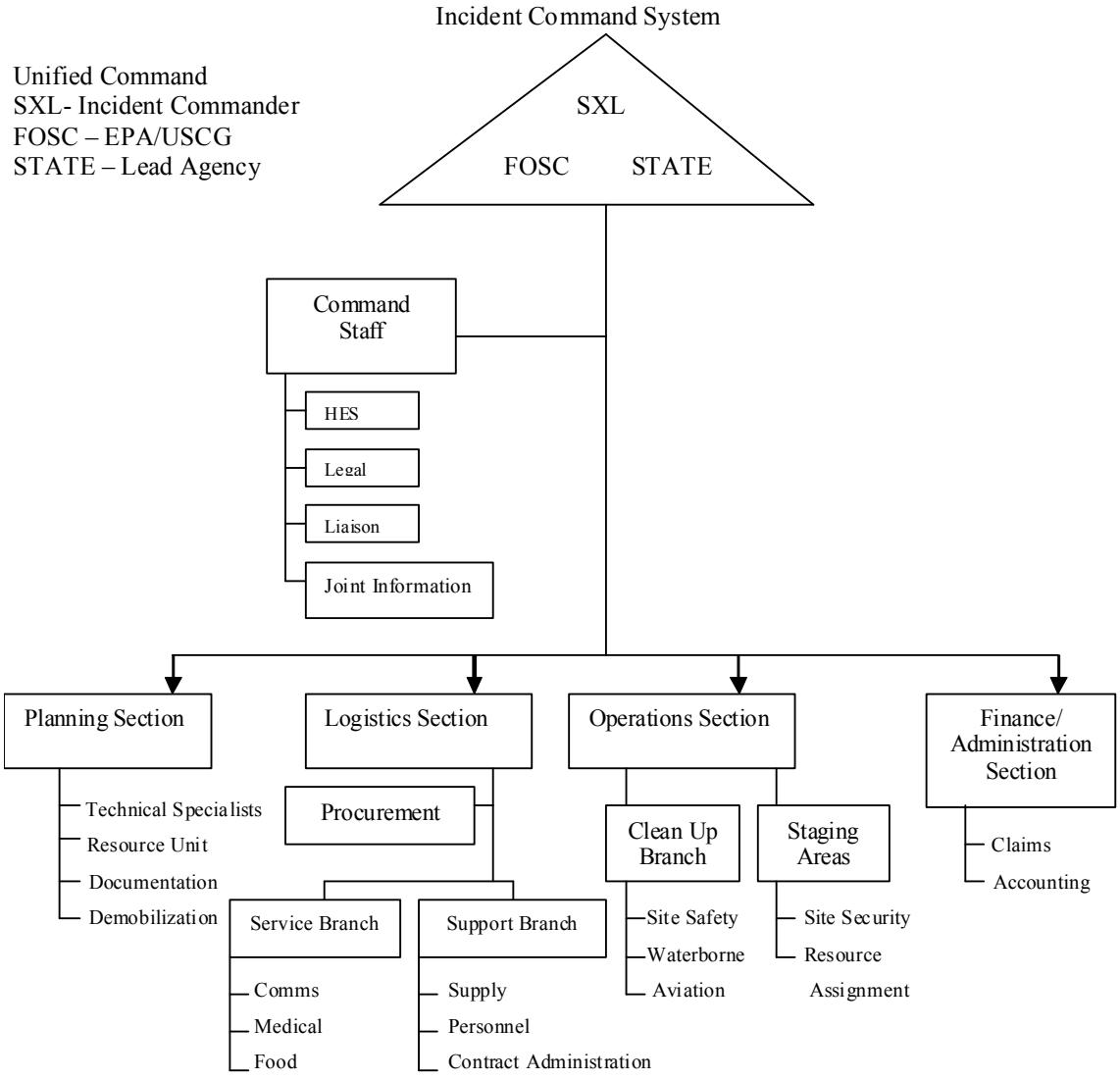
5.1 Plan Implementation Procedures

SXL has instituted the Incident Command System following National Interagency Incident Management System (NIIMS) guidelines for response to emergencies. Each company owned facility has the capability of activating the entire corporate infrastructure as necessary to respond to an incident. This system is consistent with the response organization in the Area Contingency Plan. The ICS is of a flexible design to provide the appropriate level of resources to meet the requirements of the emergency. Trained personnel assigned to respond will be selected from various subdivisions of SXL. In addition to SXL will provide trained response personnel from other divisions, as necessary, to assure 24-hr operations. Job descriptions for each ICS position are provided in **APPENDIX D**.

Information Flow

Information will be shared throughout the response organization via period briefing sessions and posted status boards in the command center. A joint information team will be assembled to assure information released to the public is accurate and complete.

5.2 ICS Structure



5.3 Response Resources for Small, Medium and Worst Case Discharges

For small and medium spills, OSROs listed in Section 1.3 will supply the minimum of 1000 feet of boom and other response equipment and personnel as required.

5.3.1 Identify Resources

(1) Emergency plans for Spill Response

Small Release - Less than 50 barrels or 2100 gallons

In the case of any small sized release, safety precautions would consist of measuring LEL and total volatiles prior to entering the affected area. If either reading precludes safe entrance, either, the application of a water spray would be used to knock down vapors or the local fire department would be contacted for application of a vapor suppressant. Adsorbent material or a vacuum truck would be used to recover any free liquid.

Additional Considerations:

* Walk perimeter of site to evaluate/assess any effect on streams; adjacent properties.
* Safety considerations.
* Exposure evaluation.
* Refer to pre response planning map.
* Is volume and location such that it can be absorbed or flushed to the collection sump.
* Evaluate whether contaminated soils will need to be addressed.

Medium Release – 2100 - 36,000 gallons

In the case of any medium sized release, measurements of both LEL and volatile petroleum vapors will be taken to determine necessary PPE. If LEL/vapors are such that safe entry cannot be made either a light water spray will be applied to the pooled petroleum or the local fire company will be requested for a vapor suppressant foam application. Adsorbent material and a vacuum truck would be used to collect any free standing liquids.

Additional Considerations:

* Safety
* Exposure
* Sun tankers for recovered product
* Perimeter tour to assess off-site impacts
* Verify dike drains closed
* Can spill be dammed up?
* If stream has been impacted install booms or if appropriate underflow dams - refer to pre response plan maps
* Have soils been impacted and need removal?

Worst Case Release ->36,000 Gallons
See Section 1.5.2 for Planning Volume Worksheet.
In the case of a Worst case occurrence, safety precautions identical to those explained in the MEDIUM probable source occurrence would be followed. A fully manned Incident Command System would be established working under the guidance of the Unified Command. Response and recovery action plans would be developed and updated as progress is made. All available resources would be activated.

Additional Considerations:

* Safety considerations due to ignitability/flammability of petroleum - remove sources of ignition, ground recovery equipment; monitor LEL continuously
* Establish hot and safe zones based on LEL and Benzene inhalation standards
* Arrange for empty Sun tankers and tanks for recovered product storage; arrange transport to refinery or TSDF/Recycler
* Daily status/planning meetings to assess effectiveness of recovery program
* Establish extent of impact - Verify if any impact on sanitary sewer system

(2) Additional Response Training
SXL has implemented both periodic and ongoing training for employees. The purpose of this training is to enable personnel to understand the nature of the products, associated health and safety hazards, safe working practices, and measures for preventing and responding to emergency situations. This training includes:

* general safety rules and procedures;
* injury, accident, and incident reporting procedures;
* Safety procedures to be followed when dealing with specific facility operations, emergency equipment location, use and operation.

In addition, employees are required to attend the periodic training seminars that incorporate the following topics:

* minimizing exposure of workers to chemical substances,
* worker training and communication of hazards,
* use of emergency equipment,
* inspection procedures,
* contingency plan implementation, (OPA, SPCC etc.)
* evacuation and emergency drill, and
* fire fighting with extinguishers.

All employees have received the OSHA 8 hr course for first responders. Periodic

updates will be provided. All Area and Terminal Operations Managers have received the 40 hr OSHA training course for first responders, and have received the annual 8 hr refresher course. In addition Terminal Managers and other key personnel have received Incident Command Training.

Documentation of all training records is maintained in a computer tracking system. This system keeps a listing of training courses, date of training, who attended, and the course/program leaders.

(3) Additional Contracted Help

SXL maintains contracts with OSRO's. OSRO contractors are listed in **Section 2.5** with additional information being provided in **APPENDIX C**.

(4) Access to Additional Response Equipment/Experts

SXL has a contract with National Response Corporation to provide a spill management team and resources. SXL also has contracts in place with numerous environmental contractors to provide scientific expertise.

(5) Ability to Implement Plan Including Response Training & Practice Drills

SXL has implemented a drill and exercise program as outlined in the National Preparedness for Response Exercise Program (PREP).

TABLE 5-1 – EXAMPLE SPILL RESPONSE ACTION CHECKLIST

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
DOCUMENT ALL ACTIONS TAKEN		
First Person to Discover Spill		
Immediately notify Qualified Individual and Operations Control Center or posted emergency contacts. Take appropriate action to protect life and ensure safety of personnel.		
Immediately shut down terminal operations (if applicable). Remotely controlled motor operated valves will be closed by the Operations Center as soon as a leak is detected.		
Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.		
Advise personnel in the area of any potential threat and/or initiate evacuation procedures.		
Qualified Individual		
Assume role of Incident Commander until relieved.		
Conduct preliminary assessment of health and safety hazards.		
Request medical assistance if an injury has occurred.		
Evacuate nonessential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if necessary).		
Make appropriate regulatory notifications. • National Response Center • Appropriate State Agency		

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
Qualified Individual (Continued)		
Call out spill response contractors (See List in **TABLE 2-5**)		
If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.		
If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that flammable vapor concentrations are within safe atmosphere before sending personnel into the spill area.		
If safe to do so, direct facility responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.		
For low flash oil (<100ºF), consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.		
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.		
Notify Local Emergency Responders. Obtain the information necessary to complete the Accident Report - Hazardous Liquid Pipeline Systems (**APPENDIX B**) and phone this information to the HES Manager.		
On-Scene Coordinator		
Activate all or a portion of ERP (as necessary). Liaison Officer will maintain contact with notified regulatory agencies.		
Ensure that ERP have mobilized spill response contractors (if necessary). **It is much better to demobilize equipment and personnel if not needed than to delay contacting them if they are needed.**		
Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
Water Based Spills: Initiate spill tracking and surveillance operations utilizing information in **SECTION 4.2**. Determine extent of impact via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in **SECTION 4.3**. Send photographer /videographer if safe.		

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
Land Based Spills: Initiate spill tracking and surveillance if applicable.		
SECONDARY RESPONSE ACTIONS (Refer to ERP job descriptions in **APPENDIX D**)		

5.4 Disposal Plans

Initial oil handling and disposal needs may be overlooked in the emergency phase of a response, which could result in delays and interruptions of cleanup operations. Initially, waste management concerns should address:

- Equipment capacity
- Periodic recovery of contained oil
- Adequate supply of temporary storage capacity and materials

The following action items should be conducted during a spill response:

- Development of a Site Safety and Health Plan addressing the proper PPE and waste handling procedures
- Development of a Disposal Plan in accordance with any federal, state, and/or local regulations. Continuous tracking of oil disposition in order to better estimate amount of waste generated over the short and long-term
- Organization of waste collection, segregation, storage, transportation, and proper disposal
- Minimization of risk of any additional pollution
- Regulatory review of applicable laws to ensure compliance and (if appropriate) obtain permits
- Documentation of all waste handling and disposal activities
- Disposal of all waste in a safe and approved manner

Good hazardous waste management includes:

- Reusing materials when possible
- Recycling or reclaiming waste
- Treating waste to reduce hazards or reducing amount of waste generated

The management of the wastes generated in cleanup and recovery activities must be conducted with the overall objective of ensuring:

- Worker safety
- Waste minimization
- Cost effectiveness
- Minimization of environmental impacts
- Proper disposal

- Minimization of present and future environmental liability

The recovered material shall be stored in any available empty tank or in portable tanks which will be obtained by contract. The OSROs, as noted in the services contract, have some temporary storage capabilities. The facility shall attempt to recover and reuse retrieved oil to the maximum extent practicable. If this is impossible, then priority will be placed upon methods for recycling the waste material off-site. Disposal of the waste material shall be pursued as a last option. The following procedures describe how and where the facility intends to recover, reuse, decontaminate or dispose of materials after a discharge has taken place.

Recovery Procedures

1) The facility plans to recover spilled product by utilizing; collection sump, skimmers, pumps, tank trucks, absorbent pads and booms
2) Recovered product will be stored on a temporary or permanent basis in the following types of tanks and/or containers: product tanks, portable tanks, slop tanks, containers (e.g. drums, tote containers, etc.)
3) Recovered materials will be transported to off-site use & recycling of recovered product including: refinery, used oil recycler, energy recovery (e.g., cement kiln, asphalt plant).
4) Disposal procedures applicable to the following media: contaminated dirt and debris, contaminated equipment, absorbents, contaminated liquids
5) Sunoco Partners facilities adhere to all applicable local, state, and federal regulations with regards to containerization, temporary storage, and transportation of the waste material(s) to a licensed disposal facility.

Specific procedures related to off-site disposal include:

A. Sample the material for the analytical parameters specified at the disposal facility. The number of samples will be determined by the volume of waste stored.

B. Laboratory analytical data will be reviewed by SXL personnel before disposal of material takes place.

5.5 Containment and Drainage Planning

The facility is equipped with containment and diversionary structures designed to prevent spilled oil from reaching waters of the United States. Drainage Diagrams are presented in **APPENDIX E**.

6.0 FACILITY INSPECTIONS AND RESPONSE TRAINING

6.1 Facility Inspections

In accordance with 40 CFR 112.7 (e)(8), each facility maintains written procedures and records of inspection. The inspection shall include tanks, secondary containment, and response equipment at the facility.

Facility self-inspection requires two steps:

- Checklist of items to inspect
- Method of recording the actual inspection and its findings.

Note: Records must be maintained for five (5) years.

Facility specific procedures for transfer and secondary containment inspections are provided in the facility Spill Prevention Control and Countermeasures (SPCC) Plan.

Daily Inspections

A daily visual inspection is conducted of the entire facility. Loading racks, dikes, indoor storage areas, the vapor recovery unit, and the collection sump are inspected daily for the following, where applicable:

* pipes, pumps, valves, and fittings for leaks;
* tanks, seams, and supporting structures for deterioration;
* containment areas for deterioration;
* the presence of petroleum related material;
* alarm and communication systems for operability; and
* safety equipment for malfunctions.

Should the inspector note any situation that warrants remedial action, he/she will have corrective action initiated immediately. Any unusual occurrences are logged in the daily log book.

Monthly Inspections

SXL routinely performs monthly inspections of the entire facility. The coordination of these inspections is the responsibility of the Terminal Operations Manager. An in-depth review of the following areas is conducted:

* safety equipment,
* emergency equipment,
* housekeeping procedures,
* maintenance procedures,
* safe job procedures,
* potential unsafe conditions,
* integrity of tanks and equipment,
* condition and operation of the collection sump, and
* condition of the vapor recovery unit.

Upon completion of the inspections and review, the manager will prepare list of recommended changes as required. These recommendations will result primarily from one of the following factors:

* decrease in containment or equipment efficiency,
* potential hazard to human health, potential endangerment to the environment,
* potential hazards associated with changes to the facility or operational procedures.

Periodic Inspections

A detailed inspection of the entire facility is conducted periodically. A detailed inspection includes taking storage tanks out of service for inspection and maintenance. The following areas are addressed:

* shell thickness;
* tank corrosion, scouring, and bulging;
* tank seams;
* pipe connections;
* level indicators;
* pipe leaks, corrosion, and pitting;
* valve leaks, corrosion, and cracks;
* flange corrosion, leaks; and
* pipe supports.

Any problems found are corrected promptly, and detailed inspection reports are prepared for submittal to the Area Operations Manager.

6.2 Facility Drills/Exercises

The Company participates in the National Preparedness for Response Exercise Program (PREP) in order to satisfy the exercise requirements of the PHMSA and EPA, following the Sunoco Logistics "PREP" Training and Record Guide EPP-101.

The Facility/Area Manager is responsible for the following aspects:

- Scheduling
- Maintaining records
- Implementing
- Evaluation of the Company's training and exercise program
- Post-drill evaluation improvements

The Following Applies To All Drills and Exercises:

Certification

Self Certification. An Exercise/Incident Response Self Assessment Form should be completed and kept in the exercise section of the Response Plan.

Verification

EPA/USCG

Records

Records should be kept at the facility for five years. All records of Drills and Exercises are kept electronically. These records are kept for at least five years and are available for inspection by request.

Credit

Plan holder should take credit for this exercise when conducted as a standalone event or in conjunction with other exercises as long as all other objectives are met, the exercise is evaluated, and proper record is generated.

Training Logs

All completed training is documented at the facility.

Applicability

Applies to Facility Personnel, Qualified Individuals, Response Team Members & OSRO's. Where applicable SXL personnel will participate in drills conducted by Co-ops or other mutual aid associations. After each exercise or drill, the Terminal Personnel and HES representatives evaluate the effectiveness of the plan and the response activities and implements any necessary corrective actions. An Exercise Self-Certification form is used for this purpose. The appropriate forms are completed for all PREP activities. In evaluating the exercise or drill the following objectives are used.

TABLE 6-1 – PREP REQUIREMENT MATRIX

Requirement/Scope/Objective	Frequency	Comments
Annual Review of Emergency Plan **Scope**: Annually review the emergency plan.	Annually-Not to exceed 15 months.	Review to be completed by the Emergency Response Coordinator and the Area Manager.
QI/FSO Notification Drill **Scope**: To exercise the communication between the facility personnel and Qualified Individual. **Objective**: Contact the QI	Quarterly one of the four drills must be conducted during off hrs)	This is a quarterly phone call to the QI or Alt. QI (FSO or Alt. FSO for Marine Terminals) when they are not on site. The person calling needs to ask how long it would take the QI or FSO to reach the site in the event of a spill.
Emergency Procedures Drill **Scope:** Exercise emergency procedures for the facility to mitigate or prevent any discharge or substantial threat of discharge resulting from the facility operational activities. **Objective:** Conduct an exercise of the	Quarterly (Can be done in conjunction with regularly scheduled safety or other training)	This unannounced OPTIONAL drill should be used by facilities with no equipment for deployment to meet the requirement for an unannounced exercise. It can be accomplished by EITHER method listed:

facility's emergency procedures to ensure personnel knowledge of actions to be taken to mitigate the solution.		1) During the QI drill notification 2) By randomly asking an employee what he/she would do to initiate response to a particular scenario and record on the appropriate forms.
Phone Number Verification Exercise **Scope**: Periodically check the FRP numbers to verify the listing is active and correct. **Objective**: Verify phone numbers on Notification Lists are correct and modify as required.	Semi-Annual	Update the notification list periodically (recommended at least once every 6 months) as part of the normal course of conducting business.
Equipment Deployment SXL Owned **Scope**: To deploy and operate the SXL owned emergency equipment identified in the response plan. **Objective**: Demonstrate the ability of contracted personnel to deploy and operate response equipment.	Semi-annual (DOT Facilities are annual)	Equipment requiring deployment is hard boom and skimmers and other response equipment listed in the plan. 1 deployment per year must be unannounced.
Equipment Deployment OSRO Owned **Scope:** To deploy and operate the OSRO owned emergency equipment identified in the plan. **Objective**: Demonstrate the ability of contracted personnel to deploy and operate response equipment	Annual (A certification will be provided by the OSRO)	A letter will be requested by the Emergency Response Specialist and posted on the SXL Intranet page. The letter from the OSRO will state they have deployed the necessary equipment in the same operating environment as our facility.
Spill Management Team-Table Top Exercise (SMT-TTX) **Scope**: Exercise the SMT organization, communication, and decision making in managing a spill response. **Objective**: Team should demonstrate knowledge of the response plan-ability to organize team members to effectively work within the unified command.-communication capabilities-coordination for response capabilities as outlined in the response plan.	Annual	In the triennial cycle, one SMT-TTX must involve a worst case discharge.

6.2.1 Post Incident Review

In the case of the following spills from a 49 CFR Part 195 regulated pipeline, an example of an Exercise/Incident Response Self Assessment Form as noted in **TABLE 6-1** will be completed:

- Any spill resulting in an explosion or fire
- Any spill resulting in the death of any person
- Any spill resulting in an injury requiring inpatient hospitalization
- Any spill impacting a lake, reservoir, stream, river or similar body of water
- Any spill resulting in more than $50,000.00 in damage including the cost of damage to facilities, spill cleanup, emergency response, value of lost product and damage to property

In the case of spills that don't meet the criteria listed above, an example of an Exercise/Incident Response Self Assessment Form as noted in **TABLE 6-1** will be completed. The determination to perform an Incident Review will be made on a case-by-case basis.

Pertinent facility personnel involved in the incident shall be debriefed (by the Company) within the calendar quarter after termination of operations. An example of an Exercise/Incident Response Self Assessment Form is provided in **TABLE 6-1**. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the efficiencies.

The post-incident review is also intended to identify which response procedures, equipment, and techniques were effective and which were not and the reason(s) why. This type of information is very helpful in the development of a functional Plan by eliminating or modifying those response procedures that are less effective and emphasizing those that are highly effective. This process should also be used for evaluating training drills or exercises. Key agency personnel that were involved in the response may be invited to attend the post-incident review.

TABLE 6-2 – EXERCISE/INCIDENT RESPONSE SELF ASSESSMENT FORM

Location**:** _____

Date: _____

Check as appropriate

Type of Exercise:

Table Top Drill ☐ Equipment Deployment ☐ Emergency Procedures ☐ Actual Spill ☐

Exercise was: Announced ☐ Unannounced ☐

Scenario: Average Most Probable ☐ Maximum Most Probable ☐ Worst Case ☐

Section I. Summary of Exercise/Incident: If documenting a tabletop exercise attach a copy of the exercise scenario. If documenting an actual spill incident or equipment deployment, describe the event. Attach additional pages if necessary or refer to IMPACT report. Note: Include additional pages if necessary.

Participants/Evaluation Team	**Company**

(Attach roster sheet if required)

Qualified Individuals:

_____

_____

Date Evaluation Conducted: _____

Section II. Exercise / Incident Response Evaluation

Check Off Plan Components Exercised:	
☐ Notifications	☐ Protection
☐ Staff Mobilization	☐ Disposal
☐ Ability to Operate within ICS	☐ Communications
☐ Discharge Control	☐ Transportation
☐ Assessment	☐ Personnel Support
☐ Containment	☐ Equipt Maint/Support
☐ Recovery	☐ Procurement
	☐ Documentation

Describe How the Following Objectives Were Exercised: (5 is excellent)

Knowledge of Facility Response Plan 1 2 3 4 5
Comments:
- Was the Plan used during the response?
- Was the Plan referenced during the response?
- Was the information in the plan accurate?
- What changes to the Plan are recommended?

Notification Phase: 1 2 3 4 5
Comments:
- Were the numbers in the Plan correct?
- Were their any numbers missing from the Plan?
- Were notifications made in a timely manner?
- Are any corrections to the Plan necessary?

Communications system: 1 2 3 4 5
Comments:
- Were operational units able to communicate directly with the ICS team?
- Could the ICS team communicate efficiently with all necessary parties?
- Did communication abilities affect decision making?
- Were the frequency of update meetings adequate?

Response Efforts: 1 2 3 4 5
Comments:
- Were SXL response actions done in a timely manner?
- Were resources requested in a timely manner?
- Were adequate SXL resources available in a timely manner?
- What if any improvements could be made?
- Did information get properly communicated during the update meetings?
- Was the ICS team established in a timely manner?

Was the ICS team properly staffed?

OSRO Performance : 1 2 3 4 5

Comments:

Did the OSRO respond in a timely manner?
Did the OSRO respond with the proper resources?
Did the OSRO have enough resources?
Was the OSRO's performance adequate?
Were the OSRO's personnel knowledgeable in their assigned tasks?
Was the OSRO's equipment in good working order?

Coordination with Agencies: 1 2 3 4 5

Comments:

Did regulatory agencies come to the spill site?
Did regulatory agencies call about the spill?
Who from the ICS team interacted with the agencies?
Were all of the appropriate agencies notified?
Who made the agency notification?
Was all of the needed information made available to the person making the notification?

Ability to access sensitive area information 1 2 3 4 5

Comments:

Did the plan contain all of the available sensitive information needed?
Was the sensitive area information available to the people in the field?
Are updates to the sensitive information required?

Section III. Corrective Actions

ITEM	Responsibility	Estimated Completion

Note: Include additional pages if necessary

6.3 Response Training

SXL has implemented both periodic and ongoing training for employees. The purpose of this training is to enable personnel to understand the nature of the products, associated health and safety hazards, safe working practices, and measures for preventing and responding to emergency situations. This training includes:

* general safety rules and procedures;
* injury, accident, and incident reporting procedures;
* Safety procedures to be followed when dealing with specific facility operations
* emergency equipment location, use and operation.

In addition, employees are required to attend the periodic training seminars that incorporate the following topics:

* minimizing exposure of workers to chemical substances,
* worker training and communication of hazards,
* use of emergency equipment,
* inspection procedures,
* contingency plan implementation, (OPA, SPCC etc.),
* Incident Command System training,
* evacuation and emergency drill, and
* fire fighting with extinguishers.

All employees have received the OSHA 8-hr course for first responders. Periodic updates will be provided. All Area and Terminal Operations Managers have received the 40-hr OSHA training course for first responders, Incident Command training and have received the annual 8-hr refresher course.

Documentation of all training records is maintained on site and electronically in a central location. This system keeps a listing of training courses, date of training, who attended, and the course/program leaders.

Personnel Response Training Logs

All training records are kept electronically in a central location. Paper copies are maintained at the terminal. These records are available upon request.

Discharge Prevention Meeting Logs

Records of these meetings are maintained at the terminal.

Training Requirements are presented on **TABLE 6-3**:

TABLE 6-3 – TRAINING REQUIREMENTS

Training Type	Training Characteristics
Training in Use of Oil Spill Plan	• All field personnel will be trained to properly report/monitor spills • Plan will be reviewed annually with all employees and contract personnel • A record of Personnel Response Training will be maintained.

OSHA Training Requirements	• All Company responders designated in Plan must have 24 hrs of initial spill response training
	  ◦ Laborers having potential for minimal exposure must have 24 hrs of initial oil spill response instruction and 8 hrs of actual field experience
	  ◦ Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hrs of initial training offsite and 24 hrs of actual field experience
	  ◦ On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hrs of specialized hazardous waste management training
	  ◦ Managers/employees require 8 hrs of annual refresher training

Spill Management Team Personnel Training	• Will follow EPP-101
Training for Casual Laborers or Volunteers	• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training
Wildlife	• Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife
Training Documentation and Record Maintenance	• Training activity records will be retained five years for all personnel following completion of training • Company will retain training records indefinitely for individuals assigned specific duties in Plan • Training records will be retained.

TABLE 6-3 TRAINING REQUIREMENTS Continued

Training Type	Training Characteristics
Emergency Response Training	The Company has established and conducts a continuing training program to instruct emergency response personnel to: • Carry out emergency procedures established under 195.402 that relate to their assignments; • Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions; • Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action; • Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and • Learn the proper use of fire-fighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition. At intervals not exceeding 15 months, but at least once each calendar year, the Company shall: • Review with personnel their performance in meeting the objectives of the emergency response training program set forth in 195.403(a), and • Make appropriate changes to the emergency response training program as necessary to ensure that it is effective. The Company requires and verifies that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under 195.402 for which they are responsible to ensure compliance.

TABLE 6-3 TRAINING REQUIREMENTS Continued

Training Type	Training Characteristics
Minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility	The Company has a written qualification program that includes provisions to: • Identify covered tasks; • Ensure through evaluation that individuals performing covered tasks are qualified; • Allow individuals that are not qualified pursuant to 49 CFR 195 Subpart G to perform a covered task if directed and observed by an individual that is qualified; • Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an accident as defined in Part 195; • Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task; • Communicate changes that affect covered tasks to individuals performing these covered tasks; and • Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed. **RECORDS** Each operator shall maintain records that demonstrate compliance with 49 CFR Part 195, Subpart G. Qualification records shall include: • Identification of qualified individuals • Identification of covered tasks the individual is qualified to perform • Date(s) of current qualification Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

6.3.1. Additional Training Information

The following Table of Contents is taken from the SXL HES Field Training Manual. A copy of this manual is located at each facility and serves as a guide for the annual training of SXL employees.

7.0 SITE SECURITY

7.1 Required Security Measures

Due to the large amount of public attention created at an oil spill site, additional security measures are required. Several measures should be planned in advance to prepare security personnel for possible events that may occur at the spill site. An example checklist for site security is provided in **TABLE 7-1**. An overview of facility security is presented in **TABLE 7-2**.

TABLE 7-1 EXAMPLE SITE SECURITY CHECKLIST

SITE SECURITY CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Restrict access to the facility.			
Direct traffic away from the spill area.			
Request assistance from the spill area.			
Request assistance from the sheriff department to: • Establish road blocks where necessary to secure the area • Divert local traffic away from the spill area • Provide access for spill response equipment and personnel			
Coordinate rescue operations with the local fire department paramedics.			
Request the Federal On-Scene Coordinator ask the FAA to restrict air space over the safety zone.			
Contract for additional security personnel (as needed).			
Maintain strict control over all personnel and entering vehicular traffic.			
Position security personnel to effectively control non-response personnel.			
Barricade lesser traveled points with appropriate signs warning against entry.			
Establish check points at barricaded points to verify security effectiveness.			
Maintain a log that documents all security related incidents and observations made at the spill site.			
Establish a pass system and distribute pre-prepared security passes to all spill related personnel.			
Ensure all response equipment is safeguarded.			

TABLE 7-2 FACILITY SECURITY OVERVIEW

FACTOR	DESCRIPTION
Emergency cut-off locations	At each applicable site
Enclosure	Chain-link fencing topped by barbed wire surrounds the facility including the riverfront and secured gates encloses the entire facility. Contract security officers man the main gate to the facility 24 hrs a day. All unmanned gates are locked when unattended.
Guards and their duties; day and night	24 hr detail
Lighting	Lights illuminate the Tank Farm areas, the fuel island, the truck loading/unloading area, and the warehouse. Individual tanks have their own lights where safety conditions warrant. Lighting is adequate to detect spills during nighttime hrs. Because of the lighting and site security, vandalism is unlikely.

8.0 RESPONSE PLAN COVER SHEET AND SUBSTANTIAL HARM CRITERIA

8.1 Response Plan Coversheet

The key Contact for Plan Development and maintenance is Russell Howerton, Sunoco Logistics, HES: (409) 659-8430.

Procedure for Contacting the Facility Owner on a 24 hr basis: Dial **(409)721-4881.**

Owner/ operator of facility:	**Sunoco Partners Marketing & Terminals L.P.**
Facility name:	**Nederland Terminal**
Facility address (street address or route):	**2300 North Twin City Highway**
City, state, and U.S. zip code:	**Nederland, TX 77627**
Facility mailing address:	**As Above**
Facility phone number.:	**(409) 721-4881**
Latitude /Longitude:	**30 ° 00 ' 12 '' N/ -93 ° 58 ' 40 '' W**
Dun & Bradstreet number:	**10-119-7205**
Largest above ground oil storage tank capacity (gallons):	**27,720,000**
Number of above ground oil storage tanks:	**160**
North American Industrial Classification System (NAICS):	**424710**
Maximum oil storage capacity (gallons):	**91,41,84,810**
Worst case oil discharge amount (bbls.):	**660,000**
Facility distance to navigable water:	**(0-1/4 mile) Facility is adjacent to Neches River**

8.2 Applicability of Substantial Harm Criteria

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000-gallons?

☑Yes ☐No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?

☐Yes ☑No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

☑Yes ☐No

Does the facility has a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

☑Yes ☐No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

☐Yes ☑No

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____ **Date:** 1.18.2013

Name: G. W. TURNER **Title:** Terminal Mgr.

All facility response plans shall be consistent with the requirements of the National Oil and Hazardous Substance Pollution Contingency Plan.

Appendix A- EPA/FRP CROSS REFERENCE

TABLE A-1 EPA/FRP CROSS REFERENCE

EPA FRP REQUIREMENTS	LOCATION
Facility Information	
General Information (1.0)	
• Facility Name	**Section 1.2**
• FRP #	**Section 1.2**
• Facility Address	**Section 1.2**
• Facility Telephone	**Section 1.2**
• Facility Owner	**Section 1.2**
• Owner Address	**Section 1.2**
• Owner Telephone	**Section 1.2**
• Name of Protected Waterway/ Env. Sensitive Area	**Section 1.2**
• Distance from Facility	**Section 1.2**
Standard Facility Response Plan (sec. 1.0)	
Emergency Response Action Plan (ERAP) (sec. 1.1)	
Qualified Individual (QI) information (sec. 1.2) partial	**Table 1-1 (ERAP)**
Emergency notification phone list (sec. 1.3.1) partial	**Table 2-1 (ERAP)**
Spill response notification form (sec. 1.3.1) partial	**Section 3.0 (ERAP)**
Response equipment list and location (sec. 1.3.2) complete	**Section 4.0 (ERAP)**
Response equipment testing and deployment (sec. 1.3.4) complete	**Section 5.0 (ERAP)**
Facility response team list (sec. 1.3.4) partial	**Section 6.0 (ERAP)**
Facility evacuation plan (sec. 1.3.5) condensed	**Section 7.0 (ERAP)**
Immediate actions (sec. 1.7.1) complete	**Section 8.0 (ERAP)**
Facility diagrams (sec. 1.9) complete	**Section 9.0 (ERAP)**
Facility Information (sec. 1.2)	
Facility name and location (sec. 1.2.1)	**Section 1.2.1**
Latitude and longitude (sec. 1.2.2)	**Section 1.2.2**
Wellhead protection area (sec. 1.2.3)	**Section 1.2.3**
Owner/ operator (both names included, if different (sec. 1.2.4)	**Section 1.2.3**
Qualified Individual (sec. 1.2.5) (name, position, home and work address, phone numbers) and specific response training experience	**Section 1.2.4**
Date of oil storage start-up (sec. 1.2.6)	**Section 1.2.5**
Current operation (sec. 1.2.7)	**Section 1.2.6**
Date and type of substantial expansion (sec. 1.2.8)	**Section 1.2.6**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Emergency Response Information (sec. 1.3)	
Notification (sec. 1.3.1)	
National Response Center phone number	**Table 2-1**
Qualified Individual (day and evening) phone numbers	**Table 1-1**
Company Response Team (day and evening) phone numbers	**Table 2-3**
Federal On-Scene Coordinator (FOSC) and/ or Regional Response Center (day and evening) phone numbers	**Table 2-1**
Local response team phone numbers (fire department/ co-ops)	**Table 2-1**
Fire marshal (day and evening) phone numbers	**Table 2-1**
State Emergency Response Commission (SERC) phone number	**Table 2-1**
State police phone number	**Table 2-1**
Local Emergency Planning Committee (LEPC) phone number	**Table 2-1**
Local water supply system (day and evening) phone numbers	**Table 2-1**
Weather report phone number	**Table 2-1**
Local TV/ radio phone number(s) for evacuation notification	**Table 2-1**
Hospital phone number	**Table 2-1**
Spill Response Notification Form	
• Reporter's name	**Section 2.2**
• Company information	**Section 2.2**
• Incident description	**Section 2.2**
• Materials	**Section 2.2**
• Response actions	**Section 2.2**
• Impact	**Section 2.2**
Response Equipment List (Identify if Facility, OSRO, CO-OP owned) (sec.1.3.2)	
Equipment list	**Section 2.3, Table 2-2**
Equipment location	**Table 2-2**
Release handling capabilities and limitations	**Section 2.3**
Response Equipment Testing/ Deployment (sec. 1.3.3)	
Last inspection or equipment test date	**Section 2.4**
Inspection frequency	**Section 2.4**
Last deployment drill date	**Section 2.4**
Deployment frequency	**Section 2.4**
OSRO certification (if applicable)	**Section 2.4**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Response Personnel (sec. 1.3.4)	
Emergency response personnel list	**Table 2-3, Section 2.5**
Emergency response contractors	**Table 2-1, Section 2.5**
Evidence of response capability	**Appendix C**
Facility response team list (sec. 1.3.4)	**Table 2-3**
Evacuation Plans (sec. 1.3.5)	
Facility-wide evacuation plan	**Section 2.6**
Reference to existing community evacuation plans (sec. 1.3.5.3)	**Section 2.6**
Evacuation routes shown on diagram	**Appendix E**
Qualified Individual's Duties (sec. 1.3.6)	
Description of duties	**Section 2.7**
Consistent with requirements	**Section 2.7**
Hazard Evaluation (sec. 1.4)	
Hazard Identification (sec. 1.4.1)	
Schematic Diagram	
Labeled schematic drawing	**Appendix E**
Above-ground tanks identified separately	**Table 3-1**
Below-ground tanks identified separately	**N/A**
Surface impoundments identified separately	**N/A**
Tank Form:	
Tank number	**Table 3-1**
Substance stored	**Table 3-1**
Quantity stored	**Table 3-1**
Tank type and year installed	**Table 3-1**
Maximum capacity	**Table 3-1**
Surface Impoundment Form:	
Surface impoundment number	**N/A**
Substance stored	**N/A**
Quantity stored	**N/A**
Surface area/ year	**N/A**
Maximum capacity	**N/A**
Failure/ Cause	**N/A**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Facility Operations Description:	
Loading and unloading procedures	**Section 3.5**
Day to day operations	**Section 3.2**
Secondary containment	**Section 3.2**
Daily throughput	**Section 3.2**
Vulnerability Analysis (sec. 1.4.2)	
Vulnerability of:	
• Water intakes	**Table 3-2**
• Schools	**Table 3**
• Medical facilities	**Table 3**
• Residential areas	**Table 3**
• Business	**Table 3**
• Wetlands or other environmentally sensitive areas	**Table 3**
• Fish and wildlife	**Table 3**
• Lakes and streams	**Table 3**
• Endangered flora and fauna	**Table 3**
• Recreational areas	**Table 3**
• Transportation routes (air, land, and water)	**Table 3**
• Utilities	**Table 3**
• Other applicable areas	**Table 3**
Analysis of Potential for a Spill (sec. 1.4.3)	
Probability of spill occurring at the facility	**Section 3.5**
Incorporates Factors:	
Tank age	**Section 3.5**
Spill history	**Section 3.5**
Horizontal range of a potential spill	**Section 3.5**
Vulnerability to natural disaster	**Section 3.5**
Facility Reportable Oil Spill History Description (sec. 1.4.4)	
Date and amount of discharge	**Section 3.6**
Materials Discharged/Cause of Discharge/Cleanup Actions	**Section 3.6**
Amount of discharge that reached navigable waters	**Section 3.6**
Effectiveness and capacity of secondary containment	**Section 3.6**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Facility Reportable Oil Spill History Description (sec. 1.4.4), Continued	
Steps taken to reduce possibility of reoccurrence	**Section 3.6**
Total oil storage capacity of tank(s) or impoundment(s) from which material is discharged	**Section 3.6**
Effectiveness of monitoring equipment	**Section 3.6**
Description of how each spill was detected	**Section 3.6**
Discharge Scenarios (sec. 1.5)	
Small and Medium Volume Discharges (sec. 1.5.1)	
Small Volume Discharges	
Small volume discharge calculation for a facility	**Section 4.2.1**
Facility-specific spill potential analysis	**Section 4.2.1**
Average most probable discharge for "complexes"	**N/A**
Average most probable discharge for "complexes"	**N/A**
Correct amount of boom for "complexes"	**N/A**
Oil recovery devices equal to small discharge (2 hour recovery time)	**Section 4.2.1**
Oil storage capacity for recovered material	**Section 4.2.1**
Medium Volume Discharges	
Medium volume discharge calculation for a facility	**Section 4.2.2**
Facility-specific spill potential analysis	**Section 4.2.2**
Maximum most probable discharge for "complexes"	**N/A**
Oil recovery devices equal to medium discharge	**Section 4.2.2**
Availability of sufficient quantity of boom	**Section 4.2.2**
Oil storage capacity for recovered material	**Section 4.2.2**
Worst Case Discharge (WCD) (sec. 1.5.2)	
Correct WCD calculations	**Section 4.2.3**
Correct WCD for "complexes"	**N/A**
Sufficient response resources for WCD	**Section 4.2.3**
Sources and quantity of equipment for response to WCD	**Section 4.2.3**
Oil storage capacity for recovered material	**Section 4.2.3**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Discharge Detection Systems (sec. 1.6)	
Discharge Detection by Personnel (sec. 1.6.1)	
Detection procedures	**Section 4.5**
Discussion of facility inspections	**Section 4.5**
Initial response actions	**Section 4.5**
Automated Discharge Detection (sec. 1.6.2)	
Equipment description	**Section 4.4**
Alarm verification procedures	**Section 4.4**
Initial response actions	**Section 4.4**
Plan Implementation (sec. 1.7)	
Response Resources (sec. 1.7.1)	
Accessibility of proper response personnel/equipment	**Section 5.1**
Emergency plans for spill response	**Section 5.3**
Additional training	**Section 5.3**
Additional contracted help	**Section 5.3**
Access to additional equipment/ experts	**Section 5.3**
Ability to implement plan, including training and practice drills	**Section 5.3**
Immediate Actions Form for small, medium, and worst-case spills	**Table 5-1**
Disposal Plans (sec. 1.7.2)	
How and where materials will be disposed	**Section 5.4**
Disposal permits	**Section 5.4**
Containment and Drainage Planning (sec. 1.7.3)	
Containment and drainage plan available	**Appendix E**
Incorporates Factors:	
Available volume of containment	**Appendix E**
Route(s) of drainage	**Appendix E**
Construction materials used in drainage troughs	**Appendix E**
Type and number of valves separators	**Appendix E**
Sump pump capacities	**Appendix E**
Containment capacity of weirs and booms	**Appendix B**
Other clean up materials	**Appendix B**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Self-Inspection, Drills/ Exercises, and Response Training (sec. 1.8)	
Facility Self-Inspection (sec. 1.8.1)	
Inspection checklist (with dates)	**Section 6.1**
Records maintained for five years	**Section 6.1**
Tank Inspection (sec. 1.8.1.1)	
Tank leaks	**Section 6.1**
Tank foundation	**Section 6.1**
Tank piping	**Section 6.1**
Response Equipment Inspection (sec. 1.8.1.2)	
Inventory (item and quantity)	**Section 6.1**
Storage location (time to access and respond)	**Section 6.1**
Operation status/ condition	**Section 6.1**
Actual use/ testing (last test date and frequency of testing)	**Section 6.1**
Shelf life	**Section 6.1**
Secondary Containment Inspection (sec. 1.8.1.3)	
Dike or berm system	**Section 6.1**
Secondary containment	**Section 6.1**
Retention and drainage ponds	**Section 6.1**
Facility Drills/ Exercises (sec. 1.8.2)	
Facility drills/ exercise description	**Section 6.2**
Equipment deployment exercise	**Section 6.2**
Unannounced exercise	**Section 6.2**
Area exercises	**Section 6.2**
Qualified Individual Notification Drills	**Section 6.2**
Qualified Individual Notification Drill Log (sec. 1.8.2.1)	**Section 6.2**
Emergency Management Team Tabletop Exercises	**Section 6.2**
Emergency Management Team Tabletop Drill Log (sec. 1.8.2.2)	**Section 6.2**
Response Training (sec. 1.8.3)	
Description of response training program (including topics)	**Table 6-2**
Personnel Response Training Logs	**Table 6-2**
Discharge Prevention Meeting Log (date, attendees)	**Table 6-2**

TABLE A-1 EPA/FRP CROSS REFERENCE Continued

EPA FRP REQUIREMENTS	LOCATION
Diagrams (sec. 1.9)	
Site Diagram includes:	
Entire facility to scale	**Appendix E**
Above and below-ground bulk storage tanks	**Appendix E**
Contents and capacities of bulk storage tanks	**Appendix E**
Contents and capacities of drum storage areas	**Appendix E**
Contents and capacities of surface impoundments	**N/A**
Process buildings	**Appendix E**
Transfer areas	**Appendix E**
Secondary containment systems	**Appendix E**
Structures where hazardous materials are used and capacity	**Appendix E**
Location of communication and emergency response equipment	**Appendix E**
Location of electrical equipment which contains oil	**Appendix E**
If a "complex" facility, interface between EPA and other regulating agencies	**N/A**
Site Drainage Diagram	
Major sanitary and storm sewers, manholes, and drains	**Appendix E**
Weirs and shut-off valves	**Appendix E**
Surface water receiving streams	**Appendix E**
Fire fighting water sources	**Appendix E**
Other utilities	**Appendix E**
Response personnel ingress and egress	**Appendix E**
Equipment transportation routes	**Appendix E**
Direction of spill flow from release points	**Appendix E**
Site Evacuation Diagram includes:	
Site plan diagram with evacuation routes	**Appendix E**
Location of evacuation regrouping areas	**Appendix E**
Site Security (sec. 1.10)	
Emergency cut-off locations	**Section 7.0, Table 7-2**
Enclosure	**Section 7.0, Table 7-2**
Guards and their duties, day and night	**Section 7.0, Table 7-2**

EPA FRP REQUIREMENTS	LOCATION
Lighting	**Section 7.0, Table 7-2**
Valve and pump locks	**Section 7.0, Table 7-2**
Pipeline connection caps	**Section 7.0, Table 7-2**
Response Plan Cover Sheet (sec. 2.0)	
Owner/ operator of facility	**Section 8.1**
Facility name	**Section 8.1**
Facility address	**Section 8.1**
Facility phone number	**Section 8.1**
Latitude and longitude	**Section 8.1**
Dun and Bradstreet number	**Section 8.1**
North American Industrial Classification System (NAICS) Code	**Section 8.1**

Largest oil tank storage capacity	**Section 8.1**
Maximum oil storage capacity	**Section 8.1**
Number of oil storage tanks	**Section 8.1**
Worst case discharge amount	**Section 8.1**
Facility distance to navigable waters	**Section 8.1**
Applicability of substantial harm criteria	**Section 8.1**
Certification	**Section 1.2.7**

TABLE A-2 USCG OPA 90 CROSS REFERENCE

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION
a) Introduction and Plan Content	
Facility Name and Location, address, city, county, state, zip, phone number, fax number.	**Section 1.2**
Facility Directions (including but not limited to maps, landmarks and river mile that could aid a responder and reviewer).	**Section 1.2**
Name, address and procedures for contacting the facility's owner or operator on a 24 hour basis.	**Section 1.2**
Table of contents.	**Table of Contents**
Period when submitted plan does not have to conform to the subpart, a cross index, if appropriate.	**Appendix A**
Record of change(s) to record information on plan updates.	**Record of Changes**
b) Emergency Response Action Plan	
1. Notification procedures	
• Prioritized list of facility response personnel. • Federal, State or local agencies, as require • Spill response notification forms to Federal, State, local agencies. Form must state that initial notification must not be delayed by collection of data. • Notification of the National Response Center.	**Table 1-1, Table 2-1**
2. Facility's spill mitigation procedures	
• Describe volume and oil groups that would be involved in the following: • Average, maximum and worse discharge from the facility. • Where applicable, the worst case discharge from the non-transportation-related facility. • Prioritized list of procedures and facility personnel (identified by job title). Procedures must address actions to be taken in the event of a discharge, potential discharge or emergency involving the following equipment and scenarios: • Transfer equipment • Tank overfill or failure • Piping rupture, leak both under pressure and not under pressure • Explosion or fire • Equipment failure • Listing of equipment and the responsibilities of facility personnel to mitigate an average most probable discharge	**Table 2-3, Section 2.5, Section 4.0, Table 2-2**

TABLE A-2 USCG OPA 90 CROSS REFERENCE Continued

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION
3. Facility's response activities	
i. Responsibilities of facility personnel to initiate a response and supervise response resources pending arrival of qualified individuals.	**Section 2.1, Appendix D, Table 5-1**
ii. Responsibilities and authority of the qualified individual and alternate as required in § 154.1026.	**Appendix D**
iii. Apply the following organizational structure to manage response actions: • Command and control • Public information • Safety • Liaison with government agencies • Spill operations • Planning • Logistics support • Finance	**Section 5.2, Appendix D**
iv. Identify oil spill removal organizations and the spill management teams to be capable of providing the following response resources: • Equipment and supplies to meet § 154.1045, 154.1047, as appropriate • Trained personnel for response to be on hand for the first 7 days of the response • Job descriptions for each spill management team member within the organizational structure in a response action.	**Table 2-1, Section 2.5**
v. For mobile facilities in more than one COTP zone, oil spill removal organizations and the spill management teams must be identified from paragraph (3)(iv) and included in each COTP zone.	**N/A**
4. Sensitive areas	
i. Identify areas of economic importance and environmental sensitivities as identified in the ACP, which are potentially impacted by a worst case discharge	**Appendix E**

TABLE A-2 USCG OPA 90 CROSS REFERENCE Continued

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION
ii. For a worst case discharge the plan must address the following: • List all sensitive elements identified in ACP that are potentially impacted by a discharge· • Describe all response actions anticipated to protect sensitive elements· • Contain map or chart that depicts each response action anticipated.	**Section 5.3, Appendix E**
iii. Identify appropriate equipment and personnel as described in §154.1028 to protect sensitive elements by one of the following calculations: • Persistent oils and non-petroleum oils discharged into non-tidal waters, the distance from the facility reached in 48 hours at maximum current. • Persistent and non-petroleum oils discharged into tidal waters, 15 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 15 miles, whichever is less, during flood tide. • Non-persistent oils discharged into non-tidal waters, the distance from the facility reached in 24 hours at maximum current. • Non-persistent oils discharged into tidal waters, 5 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide. • Spill trajectory or model may be substituted if acceptable to COTP. • Procedures contained in the Environmental Protection's Agency's regulations on oil pollution prevention may be substituted for non-tidal and tidal waters. • COTP may require additional sensitive elements to be protected depending on trajectory.	**Section 3.3, Section 3.4, Section 3.5, Section 4.0**
5. Disposal plan	
Describe actions and procedures that adhere to Federal, state or local requirements.	**Section 5.4**
c) Training and Exercises	
Training procedures of the facility owner or operator must meet requirements of § 154.1050.	**Section 6.0**
Drill procedures of the facility owner or operator must meet requirements of § 154.1055.	**Section 6.2**

TABLE A-2 USCG OPA 90 CROSS REFERENCE Continued

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION
d) Plan Review and Update Procedures	
Plan review and update procedures of the facility owner or operator must meet requirements of §154.1065 and any post-discharge review of the plan to evaluate and validate its effectiveness.	**Section 6.2**
e) Appendices	
1. Facility-specific information - principal characteristics	
i. Identify sizes, types and number of vessels the facility can transfer oil to or from simultaneously.	**Table 3-1, Section 1.2.6**
ii. Include a plan of the facility showing the mooring areas, transfer locations, control stations, locations of safety equipment, and the location and capacities of all piping and storage tanks. Identify the first valve(s) on piping separating transportation-related and non-transportation-related areas. If piping serves tank vessels from a manifold it is considered the first valve.	**Appendix E**
iii. The oil(s) and hazardous material handled, stored or transported in bulk must be documented and include the following: • Generic/chemical name • Description of appearance and odor • Hazards involved with handling or discharge • Firefighting procedures and extinguishing agents for oil/hazardous materials	**Table 3-1, Appendix F**
2. List of contacts must include primary and alternate personnel, personnel from paragraph (b) (3) (iv), and Federal, state and local officials.	**Table 2-1, Table 2-3**
3. Equipment list and records must include the following: • List of equipment and facility personnel required to respond to an average most probable discharge, as defined by §154.1020 • List of equipment belonging to an oil spill removal organization as described in §154.1028; unless the organization has been classified by the Coast Guard to equal or exceed the response capability needed by the facility	**Section 5.3, Table 2-2**

TABLE A-2 USCG OPA 90 CROSS REFERENCE Continued

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION
• When it is necessary for the appendix to contain a listing of response equipment, it shall include the following: skimmers; booms; dispersant application; insitu burning; bioremediation equipment and supplies and other equipment used to apply other chemical agents on the NCP Product Schedule; communications, firefighting and beach cleaning equipment; boats and motors; and heavy equipment • This list must also include specifications for each piece of equipment as follows: 1. type, make, model and year of manufacture, 2. for oil recovery devices, the effective daily recovery rate, 3. for containment boom, the overall boom height and type of end connectors, 4. spill scenario in which the equipment will be used, 5. total daily capacity for storage and disposal of recovered daily oil 6. for communication equipment, the type and amount of equipment intended for use during response activities, 7. location of equipment, and 8. date of last inspection.	**Table 2-2, Section 4.0**
4. Communications plan must describe the primary and alternate method of communication during discharges, including communications at the facility and at remote locations.	**Section 4.4, Appendix F**
5. Site specific safety and health plan must describe the safety and health plan to be implemented. This appendix may reference another existing plan requiring under 29 CFR 1910.120	**Appendix F**
6. List of acronyms and definitions must include all definitions that are critical to understanding the response plan.	**Appendix G**

TABLE A-3 OSHA CROSS REFERENCE

EAP REQUIREMENTS (29 CFR 1910.38 [a] [2])	LOCATION
Emergency escape procedures and emergency escape route assignments	**Section 2.6, Appendix C**
Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	**N/A**
Procedures to account for all employees after emergency evacuation has been completed	**Section 2.6**
Rescue and medical duties for those employees who are to perform them	**Appendix F**
The preferred means of reporting fires and other emergencies	**Table 5-1, Section 4.0**
Names of regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan	**Table 2-1, Table 2-3**
ERP REQUIREMENTS (29 CFR 1910.120 [l] [2])	
Pre-emergency planning	**Section 6.2, Section 6.3**
Personnel roles, lines of authority, and communication	**Section 5.2**
Emergency recognition and prevention	**Appendix F**
Safe distances and places of refuge	**Section 2.6**
Site security and control	**Section 7.0**
Decontamination procedures which are not covered by the site safety and health plan	**N/A**
Emergency medical treatment and first aid	**Appendix F**
Emergency alerting and response procedures	**Table 5-1**
Critique of response and follow-up	**Table 6-1**
PPE and emergency equipment	**Appendix F**

APPENDIX B-Notification Forms

Spill Response Notification Form

Use this form prior to calling the National Response Center as the operator will ask for the following information. **Do not delay report to research information.**

(Example)

Reported By:

Record the Following for NRC Report: (800)424-8802

Date:_____ Time:_____ Name of NRC employee who received the information:_____

Incident report number, assigned to this incident by NRC: _____

Person making report: _____Phone Number: _____

Position: _____ SXL Facility Name:_____

Responsible Party: _____

Date of Incident:_____ Time of Incident:_____

Description of incident (including distance & direction from nearest body of water); Use present location if a moving spill:_____

Oil name/ type of material involved:_____

Weather conditions on scene:_____

Estimate of amount of material lost and rate of release (if continuing): _____

Time and duration of the release: _____

Cause and circumstances of spill (should not be reported until verified unless that is no doubt or cause is obvious to public): _____

Facility Storage Capacity: _____bbls Location: Lat_____ Long _____

Description of area(s) likely to be affected, such as river, river bank, beach, wildfire area, or other properties; _____

Have there been any evacuations? _____

Actions being taken at the scene to contain spill, if any, and proposed cleanup measures:

_____

_____

_____

Agencies or persons already notified (or who will be notified): _____

_____

Personnel already on scene (or nearest to scene):_____

Contact person/telephone # (on or nearest to scene): _____

Existing and potential hazards of fire, explosion, etc., if any: _____

Personal injuries or deaths, if any:_____

Person(s) who discovered and/or are reporting spill:
Name:_____Phone: _____
Name:_____Phone: _____

Name of the operator: _____Address of the operator:_____

Completed and/or proposed actions to contain, cleanup and dispose of spilled material: _____

_____

Extent of containment of land, water, or air, if known:_____

_____

Other significant, unique or unusual circumstances known that are relevant to cause or extent of damage:

_____

_____

Follow-up notification should include:

Name of reporter:_____ Incident Number _____

Time /Date of discharge:_____

Location of Discharge: _____

Name of oil discharged: _____ Estimated volume: _____

Weather conditions on scene at the time of discharge and clean up operations: _____

_____

Texas

NOTE: In addition to the Texas reporting criteria below, **ALL** releases should be **IMMEDIATELY REPORTED** to the regional HES Environmental Specialist. Any release resulting in greater than 5,000 lbs of VOC requires 24-hour notification to the state. [Texas Administrative Code, Title 30, Section 101.201]

Crude Oil Spills					
When to Report	**Notification Numbers**	**What to Report**	**Written Follow-Up Reports**	**Mailing Address for Follow-Up Reports**	**Citation**
Reportable Quantities: a)For spills or discharges onto land: 210 gallons (5 bbl) b)For spills or discharges directly into water in the state: a quantity sufficient to create a sheen	**Inland Crude Spills:** Texas Railroad Commission – Oil & Gas Division (see appendix for numbers) **Crude Spills Impacting Coastal Waters:** Texas General Land Office (GLO) (800) 832-8224 (CHEMTEL, 24-Hour)	1) Company/operator name; 2) Location of leak or incident; 3) Time and date of accident/incident; 4) Fatalities and/or personal injuries; 5) Phone number of operator; 6) Other significant facts relevant to the accident/incident.	Complete and send in the TXRRC – Division of Oil & Gas "Crude Oil, Gas Well Liquids, or Associated Products Loss Report" (see appendix for form)	See appendix for mailing addresses	(Texas Administrative Code, Title 30,Section 327.4(b))

Texas

Petroleum Product and Used Oil					
When to Report	**Notification Numbers**	**What to Report**	**Written Follow-Up Reports**	**Mailing Address for Follow-Up Reports**	**Citation**
Reportable Quantities: a) For spills or discharges onto land: 25 gallons b)For spills or discharges to land from PST exempted facilities: 210 gallons (5 barrels) c)For spills or discharges directly into water in the state: quantity sufficient to create a sheen					(Texas Administrative Code, Title 30,Section 327.4(b))
Report Immediately (within 1 hour) any actual or threatened spill or release into the environment (use the RQ guidelines above)	**Texas Commission on Environmental Quality** (800) 832-8224 (CHEMTEL, 24-Hour) OR **TCEQ Regional Office** (see appendix)	The spill report shall include: 1)The substance and quantity actually discharged or potentially dischargeable and the rate of discharge; 2)The time, location (via latitude and longitude, N.A.D. 27 or N.A.D. 83, or by state plane coordinates indicating zone or by Universal Transverse Mercator coordinates, if known), and the apparent cause of the actual or potential discharge; 3)The size of the area actually impacted by the discharge and the area potentially impacted and whether or not any environmentally sensitive areas will be affected; 4)The nature of any response actions undertaken and the identity of the person or discharge cleanup organization engaged in response activities; 5)The name and title of the responsible person, the person in charge, and the person reporting the discharge; 6)The manner in which the responsible person and the facility or vessel involved in the actual or threatened discharge may be contacted.	Within 60 days of the incident, file a written report with the appropriate TCEQ regional office. The report shall contain the following information: 1)Incident date; 2)Amount of oil spilled; 3)Product spilled; 4)Areas that were impacted by the spill; 5)Description of the incident; 6)Summary of response activity. A description of the following actions which will be taken to prevent spills of a similar nature including their effective implementation date: a) Conducting an analysis of the cause of the unauthorized discharge. b)Training to be implemented c)Equipment operation and maintenance d)Revised procedures e)Revised inspection schedules f)Organizational changes	Mail to appropriate TCEQ regional office (see appendix)	Texas Administrative Code, Title 31, Section 19.32
If an unauthorized discharge threatens to damage or pollute property other than that of the owner or operator or responsible person…	…the person in charge and the responsible person **MUST** make reasonable efforts to **notify the owners of property threatened by the discharge** in addition to TCEQ				
If the discharge immediately threatens public health, safety, or welfare…	…the person in charge and the responsible person **MUST** notify the appropriate local health, fire, and law enforcement authorities (**911**) in addition to TCEQ				

Texas

Pipelines					
When to Report	**Notification Numbers**	**What to Report**	**Written Follow-Up Reports**	**Mailing Address for Follow-Up Reports**	**Citation**
For All Pipelines:					
Immediately Report fires, leaks, and lightening strikes to all pipelines or associated tankage	**For Crude Releases: Railroad Commission of Texas Oil and Gas Division District Office** See Appendix for District boundaries and phone numbers **For Product Releases: Texas Commission on Environmental Quality** (800) 832-8224 (24 HR) OR **TCEQ Regional Office** (See Appendix for Regional boundaries and phone numbers)	1) Company/operator name 2) Location of the leak or incident 3)Time and date of the accident/incident 4)Fatalities and/or personal injuries; 5) Phone number of the operator Other significant facts relevant to the accident incident.	Follow with a letter and/or Texas Form Interim H-8. Each pipeline shall report in writing to the Commission, by the 15th day of each calendar month, the estimated amount of oil loss by fire or leakage from its tanks and pipelines for the preceding month, the estimated amount of oil loss from its tanks and pipelines for the preceding month. The letter should include the following: 1) Location to the well/tank/receptacle/line break, given by county, survey, and property; 2) Specify what steps have been taken or are in progress to remedy the situation reported; 3) Detail the quantity (estimation is OK) of oil/gas/geothermal resources lost/destroyed/permitted to escape.	RRC Oil and Gas Division Railroad Commission of Texas, Oil and Gas Division, 1701 North Congress PO Box 12967 Capital Station, Austin TX 78711-2967	16TAC 3.20 16TAC 3.71
Immediately Report any pipeline or pipeline tank incident that involves a release of greater than 5 bbls					16TAC 3.20 16TAC 3.71
Immediately Report any pipeline or pipeline tank incidents that involve a release of crude oil into any river, lake, or stream			Within 30 days of discovery, submit Texas Form H-8 to the Commission.	RRC Oil and Gas Division Railroad Commission of Texas, Oil and Gas Division, 1701 North Congress PO Box 12967 Capital Station, Austin TX 78711-2967	16TAC 3.20 16TAC 3.71
Any third party damage related release or damage without a release	Railroad Commission of Texas No Telephonic Report. Report online to the TDRF- Texas Damage Reporting Form		Within 10 days of discovery of the damage incident or the operator's knowledge of the damage incident, the operator shall submit the information to the Commission through TDRF: http://www.rrc.state.tx.us/formpr/index.html		16 TAC 18.11

Texas

For Part 195 Regulated Pipelines:					
At the earliest practicable moment following discovery of a release (within 2 hours) which results in: 1) Death or injury requiring in patient hospitalization, 2) A fire or explosion, 3) Causes property damage including cost of cleanup, recovery, damage, and value of lost product greater than $50,000, 4) Pollutes any stream, river, reservoir or other similar body of water or shoreline, 5) Is significant in the judgment of the operator (such as media coverage)	**For Interstate Pipelines:** **NRC** (800) 424-8802	**NRC** 1)Name and address of operator, 2)Name and telephone number of reporter, 3)The location of the failure, 4)The time of the failure, 5)The fatalities and personal injuries, if any 6)All significant facts know by the operator that are relevant to the cause of the failure or the extent of the damages	**PHMSA (U.S. DOT)** As soon as practicable, but not later than 30 days after discovery of the accident file an accident report on DOT Form 7000-1. A supplemental report is required to be filed within 30days of receiving any changes of information from the original report. Written reports are required for any releases greater than 5 gallons even if they were not telephonically reportable, except that no report is required for spills less than 5 bbls resulting from a pipeline line maintenance activity if it is not otherwise reportable, does not pollute water, is confined to company property or ROW and is cleaned up promptly.	**PHMSA (U.S. DOT)** Information Resources Manager, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Room 7128, 400 Seventh Street, SW Washington, D.C. 20590	49CFR 195.50 49CFR 195.52 49CFR 195.54
	For Intrastate Pipelines: **NRC** (800) 424-8802 and **Railroad Commission of Texas –Safety Division** (512) 463-6788	**RRC-Safety Division** 1)company/operator name, 2)Location of leak or incident, 3)Time and date of accident/incident, 4)Fatalities and/or personal injuries, 5) Phone number of operator 6) Other significant facts relevant to the accident or incident.	**RRC Safety Division** Within 30 days of discovery of the incident, submit Form H-8 to the Oil and Gas Division of the Commission. In situations specified in 49 CFR 195 (see above), the operator shall also file duplicate copies of the required Department of Transportation form with the Division.	**RRC Safety Division** Railroad Commission of Texas, Safety Division, 1701 North Congress PO Box 12967 Capital Station, Austin TX 78711-2967	16 TAC 8.301

Texas

Petroleum Spills from non-DOT Tanks					
When to Report	**Notification Numbers**	**What to Report**	**Written Follow-Up Reports**	**Mailing Address for Follow-Up Reports**	**Citation**
Report petroleum releases of greater than 25 gallons **Within 24 hours** **Immediately Report** petroleum releases of greater than 25 gallons **ONLY if it CANNOT be cleaned up within 24 hours**	**Texas Commission on Environmental Quality** (800) 832-8224 (24-Hour) OR **TCEQ Regional Office (see appendix)**	The spill report shall include: 1)Time of the spill; 2)Identity of the material spilled; 3)Approximate quantity spilled; 4)Location and source of the spill; 5)Cause and circumstances of the spill; 6)Existing or potential hazards (fire, explosion, etc.), if any; 7)Personal injuries or causalities, if any; 8)Corrective action being taken and an approximate timetable to control, contain, and clean up spill; 9)Name(s) and telephone number(s) of individual(s) who discovered and/or reported the spill; 10)Other unique or unusual circumstances	Within 20 days after incident, submit a *Release Determination Report Form* (copy provided following this chart)	Mail to appropriate TCEQ regional office (see appendix)	Texas Administrative Code, Title 30, Section 327.3 & Section 334.129

Hazardous Waste					
When to Report	**Notification Numbers**	**What to Report**	**Written Follow-Up Reports**	**Mailing Address for Follow-Up Reports**	**Citation**
FOR WASTE GENERATORS THAT GENERATE BETWEEN 100kg and 1,000kg OF HAZ WASTE PER MONTH: **Immediately** report any releases that could threaten human health or the environment outside the facility, or when the release has reached surface water	**National Response Center** (800) 424-8802 **Texas Commission on Environmental Quality** (800) 832-8224 (24-Hour) OR **TCEQ Regional Office (see appendix)** *****NOTE: If facility determines that evacuation of local areas may be advisable, also immediately notify appropriate local authorities*****	1)Name, address and EPA ID Number of generator; 2)Date, time, type of incident; 3)Quantity and type of waste involved; 4)The extent of injuries, if any; 5)The estimated quantity and disposition of recovered materials, if any	A written report may be REQUESTED or REQUIRED by the TCEQ. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.	Mail to appropriate TCEQ regional office (see appendix)	Texas Administrative Code, Title 30, Section 335.69(f)(5)(D)(iii)
FOR WASTE GENERATORS THAT GENERATE 1,000kg OR MORE OF HAZ WASTE PER MONTH: **Immediately** report any releases that could threaten human health or the environment outside the facility, or when the release has reached surface water		1)Name and telephone number of reporter; 2)Name and address of facility; 3)Time and type of incident; 4)Name and quantity of materials involved, and the estimated quantity and disposition of any recovered materials; 5)The extent of injuries, if any; 6)Possible hazards to human health or the environment, outside the facility	A written report of the incident must be submitted to the TCEQ **within 15 days**, addressing the items from the telephone notification, and additionally describing the quantity and disposition of any recovered material.		Texas Administrative Code, Title 30, Section 335.69(a)(4), referring to 40 CFR 265.56, 335.113

Texas

Cleanup of Soil Contaminated by a Crude Oil Spill

(Citation: Texas Administrative Code, Title 16, Part 1, Chapter 3, Rule §3.91)

(e) Reporting requirements.

(1) **Crude oil spills over five barrels.** For each spill exceeding five barrels of crude oil, the responsible operator must comply with the notification and reporting requirements of §3.20 of this title (relating to Notification of Fire Breaks, Leaks, or Blow-outs) and submit a report on a Form H-8 to the appropriate district office. The following information must be included:

(A) area (square feet), maximum depth (feet), and volume (cubic yards) of soil contaminated with greater than 1.0% by weight total petroleum hydrocarbons;

(B) a signed statement that all soil containing over 1.0% by weight total petroleum hydrocarbons was brought to the surface for remediation or disposal;

(C) a signed statement that all soil containing over 5.0% by weight total petroleum hydrocarbons has been mixed in place to 5.0% by weight or less total petroleum hydrocarbons or has been removed to an approved disposal site or to a secure interim storage location;

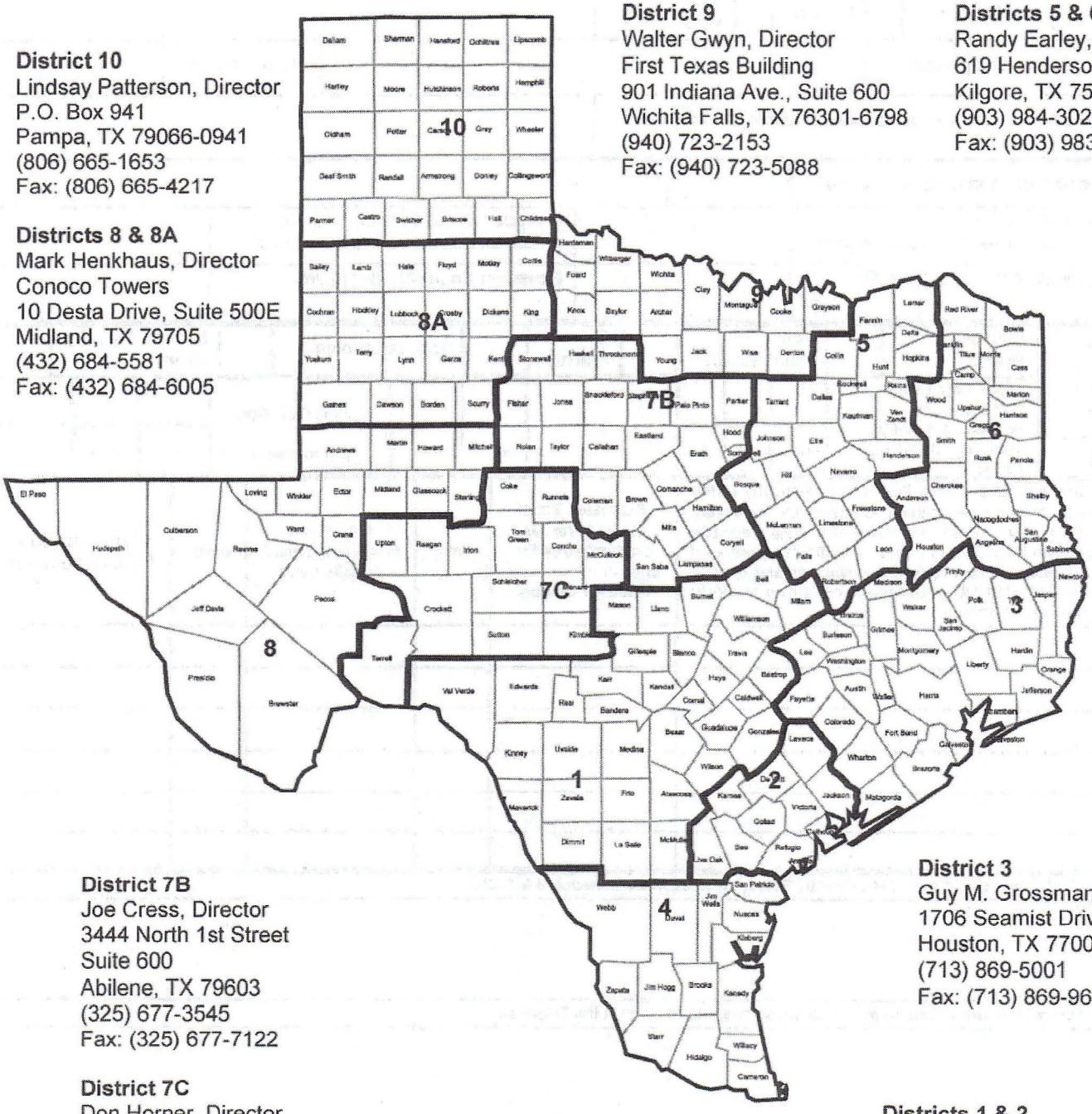
(D) a detailed description of the disposal or remediation method used or planned to be used for cleanup of the site;

(E) the estimated date of completion of site cleanup.

(2) **Crude oil spills over 25 barrels.** For each spill exceeding 25 barrels of crude oil, in addition to the report required in paragraph (1) of this subsection, the operator must submit to the appropriate district office a final report upon completion of the cleanup of the site. Analyses of samples representative of the spill site must be submitted to verify that the final cleanup concentration has been achieved.

(3) **Crude oil spills of five barrels or less.** Spills into the soil of five barrels or less of crude oil must be remediated to these standards, but are not required to be reported to the commission. All spills of crude oil into water must be reported to the commission.

TEXAS RAILROAD COMMISSION
DISTRICT OFFICES



District 10
Lindsay Patterson, Director
P.O. Box 941
Pampa, TX 79066-0941
(806) 665-1653
Fax: (806) 665-4217

Districts 8 & 8A
Mark Henkhaus, Director
Conoco Towers
10 Desta Drive, Suite 500E
Midland, TX 79705
(432) 684-5581
Fax: (432) 684-6005

District 9
Walter Gwyn, Director
First Texas Building
901 Indiana Ave., Suite 600
Wichita Falls, TX 76301-6798
(940) 723-2153
Fax: (940) 723-5088

Districts 5 & 6
Randy Earley, Director
619 Henderson Blvd.
Kilgore, TX 75662-5998
(903) 984-3026
Fax: (903) 983-3413

District 7B
Joe Cress, Director
3444 North 1st Street
Suite 600
Abilene, TX 79603
(325) 677-3545
Fax: (325) 677-7122

District 7C
Don Horner, Director
622 S. Oakes Street, Suite J
San Angelo, TX 76903-2141
(325) 657-7450
Fax: (325) 657-7455

District 3
Guy M. Grossman, Director
1706 Seamist Drive, Suite 501
Houston, TX 77008-3135
(713) 869-5001
Fax: (713) 869-9621

District 4
Fermin Munoz, Director
P.O. Box 10307
Corpus Christi, TX 78460-0307
(361) 242-3113
Fax: (361) 242-9613

Districts 1 & 2
Tom Melville, Director
115 East Travis, Suite 1610
San Antonio, TX 78205-1689
(210) 227-1313
Fax: (210) 227-4822

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

Form H-8
(Eff. 6/4/70)

CRUDE OIL, GAS WELL LIQUIDS, OR ASSOCIATED PRODUCTS LOSS REPORT

1. Field Name (as per current proration schedule, including reservoir, if applicable)		2. RRC District
3. Company	Check appropriate block(s): ☐ Producer ☐ Transporter ☐ Other _____	4. County
5. Lease Name(s) and RCC Lease Number(s) (if applicable)		
6. Location where Liquid Hydrocarbon (crude oil, gas well liquids, or associated products) Loss occurred (Section, Block, & Survey)		
7. Description of Facility from which Liquid Hydrocarbon Loss Occurred		
8. Name of Landowner where Liquid Hydrocarbon Loss Occurred	9. Type of Liquid Hydrocarbon Loss ☐ Crude Oil ☐ Gas Well Liquid ☐ Other _____	
10. Date Liquid Hydrocarbon Loss Occurred	11. Date Liquid Hydrocarbon Loss Reported to RRC District Office by Telephone or Telegraph	
12. Total Barrels of Liquid Hydrocarbon Lost in Lost in Leak or Spill	13. Total Barrels of Liquid Hydrocarbon Recovered	14. Barrels of Liquid Hydrocarbon Unrecovered (Net Loss)
15. Did Liquid Hydrocarbon Loss Affect Inland or Coastal Water? (If yes, explain.)		
16. Cause of Liquid Hydrocarbon Loss (Explain.) (If additional space is required, attach page(s).)		
17. Remedial Measures Taken and How Successful (Explain.)		
18. Remarks		

I declare under penalties prescribed in Article 6036c, R. C. S., that I am authorized to make this report, that this report was prepared by me or under my supervision and direction, and that data and facts stated therein are true, correct, and complete, to the best of my knowledge.

Date _____ Signature _____

Company _____ Name of Person (type or Print) _____

Street Address or P.O. Box _____ Title of Person _____

City, State _____ Zip Code _____ Telephone Area Code _____ Number _____

(COMPANY MUST COMPLY WITH THE INSTRUCTIONS ON THE REVERSE SIDE HEREOF.) (OVER)

Clear Form

INTERIM H-8 CRUDE OIL SPILL SHEET

INSTRUCTIONS: When filing a Form H-8, *Crude Oil, Gas Well Liquids, or Associated Products Loss Report* (form effective 6/4/70), **complete and attach this sheet for crude oil spills only**. The attachment is not required for spills limited to hydrocarbon condensate, defined as "the light, hydrocarbon liquids produced in association with natural gas." This sheet will no longer be required after Form H-8 revision. The certification on the bottom of the H-8 report to which this sheet is attached applies to the data and information supplied below.

1. Company Name, as shown on P-5 Organization Report	2. Organization P-5 No.	3. RRC District No. (Loss/Spill Site)	4. Date of Spill

5. (a) Mark any of the following if applicable

☐ The spill was into a SENSITIVE AREA* or it occurred totally or partially to 11/1/93. If so, cleanup will be supervised by the district office on a case-by-case basis. The remainder of this Interim Sheet does not have to be completed.

☐ The spill was limited to free oil with no soil being affected (example: spill was confined to area within lined fire walls). The remainder of this Interim Sheet does not have to be completed.

(b) Soil contaminated with greater than 1 percent by weight total petroleum hydrocarbons (TPH)-

Area (sq. ft)**:** **Maximum Depth** (ft.)**:** **Volume:** (cu. yd)**:**

(c) Excavation. All soil containing over 1 percent TPH was brought to surface for remediation or disposal: ☐ Yes ☐ No

(If No, explain)

(d) Remediation

(1) All soil containing over 5 percent TPH has been:

- ☐ Properly mixed in place to 5 percent or less by weight TPH
- ☐ Removed to an approved disposal site. Railroad Commission Permit No.:
- ☐ Contained in a secure interim storage location
- ☐ Not Applicable (no soil over 5 percent TPH involved)

(2) Remediation of soil down to 1 percent or less TPH will be accomplished by:

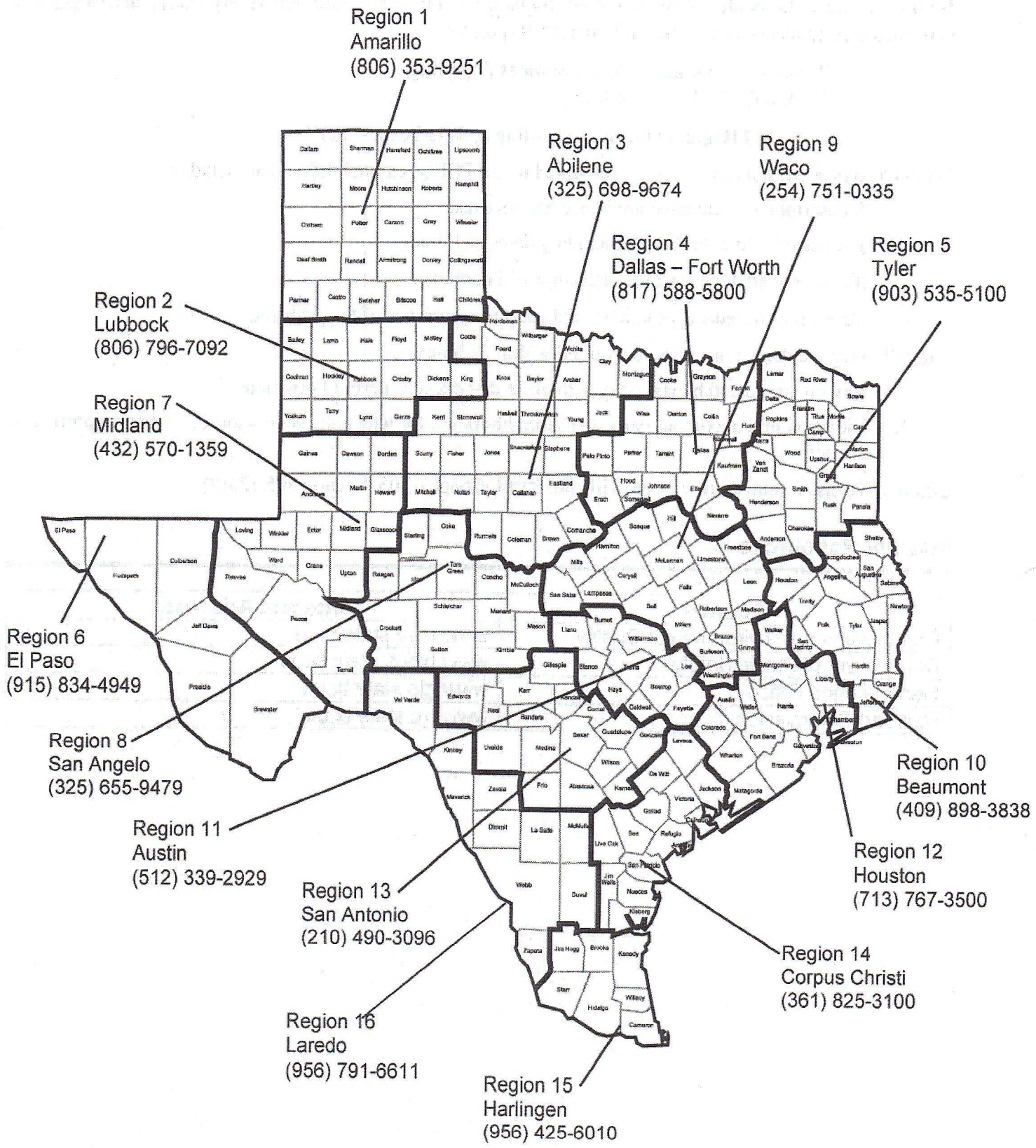
- ☐ removal from spill site
- ☐ on-site natural bioremediation
- ☐ on-site enhanced bioremediation
- ☐ other on-site remediation

(3) Estimated date for completion of soil cleanup to 1 percent by weight TPH:

*A Sensitive Area is an area defined by the presence of factors, whether one of more, that make an area vulnerable to pollution from crude oil spills. Factors that are characteristic of sensitive areas include the presence of shallow ground water or pathways for communication with deeper ground water; proximity to surface water, including lakes, rivers, streams, dry or flowing creeks, irrigation canals, stock tanks, and wetlands; proximity to natural wildlife refuges or parks; or proximity to commercial or residential areas. [Statewide Rule 91(a)(2)]

Clear Form

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
REGIONAL OFFICES



Appendix C- OSRO (Oil Spill Response Organization) Information

- **Gardner Environmental**
- **OMI**
- **National Response Corporation (NRC)**

GARNER™
The Emergency Response Company
GARNER ENVIRONMENTAL SERVICES, INC.
CORPORATE OFFICE: 1717 W. 13TH STREET, DEER PARK, TX 77536 •281-930-1200 •800-424-1716

July 9, 2012

Mr. Russell Howerton
Sunoco Logistics
2300 North Twin City Highway
Nederland, Texas 77627

Subject: National Preparedness for Response Exercise Program (PREP) OPA-90 Compliance

Dear Mr. Howerton:

Garner Environmental Services, Inc. (GES) has complied with the Oil Pollution Act of 1990 (OPA-90) and 33 Code of Federal Regulations (CFR) part 154.1055(f) and 33 C.F.R. 154.1045 as applicable with regards to response time, equipment, deployment, inspection, maintenance, drills/exercises, and notifications over the past twelve months. Our response personnel have received OSHA Hazwoper training, are in compliance with 29 C.F.R. 1910.120. and have received all the necessary training to effectively respond to an oil material release as defined in 33 C.F.R. 154.105.

Garner Environmental Services, Inc. retains personnel records for three years and certifies that our files are current and in compliance with OPA-90 OSRO PREP Guidelines, and 29 C.F.R 1910.120. Garner Environmental Services, Inc. has received official classification as an approved OSRO from the U.S. Coast Guard National Strike Force Coordination Center which is attached to this letter.

DATE	LOCATION	18" BOOM	BOATS	SKIMMERS
As of 01/01/11	Deer Park Texas	13,300'	19	19
As of 01/01/11	LaMarque Texas	16,900'	7	6
As of 01/01/11	Port Arthur Texas	34,000'	8	5

If you have any questions or require further information please do not hesitate to contact Garner Environmental Services, Inc at (281) 930-1200.

Sincerely,

Mike Rhoads
Vice-President, Business Development

U.S. Department of Homeland Security

United States Coast Guard

Commanding Officer
National Strike Force
Coordination Center

1461 N. Road St. (US 17N)
Elizabeth City, NC 27909
Staff Symbol:
Phone: (252) 331-6000
FAX: (252) 331-6012

16450
04-0027
November 1, 2004

Garner Environmental Services
Attention: Otis Chambers
1717 West 13th Street
Deer Park, TX 77536

Dear Otis Chambers,

This letter serves as the official statement by the National Strike Force Coordination Center of your classification as an Oil Spill Removal Organization (OSRO) as outlined in the Coast Guard OSRO Classification Guidelines dated 27 April 2001. A copy of this letter will be kept in your company file on these premises. Please feel free to contact my staff anytime you would like to visit and review your file.

Enclosure (1) is a copy of the classification summary sheet that identifies the classifications you received based on the resource data that you provided. This summary contains your classifications by operating area and selected COTP zones. These classifications were determined using core resource and legal/attestation documents you provided. Enclosure (2) contains Response Resource Assessment Branch (formerly the OSRO Branch) and Response Resource Inventory (RRI) contact information.

This notification reflects the information contained in the RRI as of September 23, 2004. Any equipment updates, which may have been submitted by your company in the interim, are not yet reflected in this classification notification. Currently the RRAB is developing processes to more uniformly address common OSRO issues such as changes in company ownership and the acquisition of additional resources. In the event that there is a change in your company's classification, you will receive another letter attesting to your latest classification levels.

A summary of the resource totals for Temporary Storage Capacity (TSC), Effective Daily Recovery Capacity (EDRC), and shoreline protection & containment booming can be forwarded to you upon request. A synopsis of the OSRO Classification standing, along with other useful information, is available on our web site:

http://www.uscg.mil/hq/nsfweb/nsfcc/ops/OSRO/links/osroinfoonclssifiedosro.html

If you would like more information regarding your classifications or any other matter, please contact the Response Resource Assessment Branch.

Sincerely,

A.M. CRICKARD
Chief, Logistics Inventory Division
U.S. Coast Guard
By direction

2 Enclosures

Corporate

131 Keating Drive
Belle Chasse, LA 70037
Office: (504) 394-6110
Fax: (504) 392-8977

Louisiana

221 Clendenning Road
Houma, LA 70363
Office: (985) 868-0119
Fax: (985) 868-0425

9625 Highway 182
Morgan City, LA 70381
Office: (985) 631-9664
Fax: (985) 631-2823

3407 Jack Brooks Road
New Iberia, LA 70560
Office: (337) 364-5373
Fax: (337) 367-9444

5227 N. River Road
Port Allen, LA 70767
Office: (225) 388-9992
Fax: (225) 388-0895

11966 River Road
St. Rose, LA 70087
Office: (504) 712-6947
Fax: (504) 712-6949

42519 Highway 23
Venice, LA 70091
Office: (504) 534-7563
Fax: (504) 534-7566

Texas

2308 W. Fairmont Pkwy.
La Porte, TX 77571
Office: (281) 470-2016
Fax: (281) 470-2216

8725 Industrial Circle
Port Arthur, TX 77640
Office: (409) 962-7226
Fax: (409) 962-7260

5172 W. Loop 281
Longview, TX 75603
Office: (903) 232-7131
Fax: (903) 232-7151

Environmental & Safety Products

1601 4th Street
Harvey, LA 70058
Office: (504) 367-7562
Fax: (504) 367-7567

August 10, 2012

Sunoco Logistics
Hwy 347 North
PO Box 758
Nederland TX 77627
Attn: Russell Howerton

RE: OPA "90" Compliance 2011 Deployment Letter

Dear Mr. Howerton

Please allow this letter to serve as documentation to meet the PREP requirements for all your facilities. OMI Environmental Solutions is a U.S. Coast Guard Classified "MM" through "W3" company. OMIES deploys, drills or inspects all of its equipment annually.

DATE	LOCATION	BOATS	BOOM	SKIMMER	PERSONNEL
1/15/2011	Bay St. Elaine (Cocodrie LA)	1	400'	1	9
1/15/2011	Beaumont, TX	5	1100'	2	13
1/20/2011	West Cote Blanche Bay LA	1	600'	0	6
3/19/2011	Morgan City LA	2	700'	2	7
6/8/2011	Breton Sound LA	8	11300	4	30
9/11/2011	Lafitte LA	9	6700	2	33
9/28/2011	Pecan Island LA	1	150'	1	4
9/24/2011	Houston Ship Channel TX	2	2200	0	4
10/20/2011	Plaquemine, LA	1	800'	0	7

All OMIES equipment is properly inspected, maintained, and documented in accordance with our maintenance program. In addition, all our spill response personnel have received the necessary training which includes 29 CFR 1910.120/OSHA HAZWOPER, to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In conclusion, OMI Environmental Solutions certifies that our files are current and in compliance with OPA'90 regulations pertaining to Oil Spill Removal Organizations (OSROs)

If you need any further assistance or additional information please feel free to call me at 832-758-1457.

Sincerely,

Rod Dillon

Rod DillonCompliance Manager

February, 2012
PREP Credit Report

Dear Client:

Please find attached the - ***NRC 2011 Annual Preparedness for Response Exercise Program (PREP) Equipment Deployment Summary Report*** (Attachment A) for review and retention with an accompanying Letter of Attestation (Attachment B). This report documents OSRO equipment deployment exercise information in compliance with the National Preparedness for Response Exercise Program (PREP) Guidelines for reportable and evaluated on-water equipment deployments during exercises, training and actual spill responses. It provides information necessary for your OSRO equipment deployment credit for the 2011 calendar year.

This report documents deployment of the various types of skimming systems and boom that NRC owns or controls for classification purposes. It includes equipment aboard our Oil Spill Response Vessels (OSRVs) and at Independent Contractor Network (ICN) facilities dispersed throughout the various Captain of the Ports (COTP) areas. The information categories include:

ICN/OSRV - Each response facility and OSRV that comprise the NRC's response network. We also indicate the USCG OSRO classification ID next to their names.

LOCATION - The geographical location (city/state) of the ICN facility or vessel home port.

COTP-MSO REGION - The COTP-MSO or EPA Region in which the response equipment and facility personnel are based.

SKIMMING EQUIPMENT - Each type of skimmer in the NRC owned or controlled equipment inventory. A numeric figure in the columns for each type of skimmer indicates the number of times that personnel at a particular facility or OSRV have activated and deployed this type of skimming system in the water.

BOOM EQUIPMENT - The type and amount of boom deployed by personnel assigned to a particular facility and vessel.

Each ICN Participant facility and OSRV, of which there are over one hundred and thirty, has an active file that feeds data to the Summary Report. In 2011, the following environmental service companies joined or left the ICN, or experienced a company name change as noted (updated accordingly):

Company Name	Status
Bosarge Diving	**Joined**
Mackinac Environmental Technology	**Joined**
Pacific Commercial Services	**Joined**
PAL Environmental Services	**Joined**
Teksolv, Inc.	**Joined**
Sea Tow Palm Beach	**Joined**
Shaw Group	**Deleted**
Global Petroleum	**Deleted**
Premier Electronics	**Deleted**
Renner	**Deleted**
RMR, Inc.	**Deleted**
Zaccor	**Deleted**
Industrial Cleanup, Inc.	**Deleted**
Bellon Environmental	**Now d/b/a SET Environmental, Inc.**
Symcore	**Now d/b/a Intracoastal**
Northstar Marine	**Now d/b/a Northstar Marine Environmental Services**
Coteau Environmental	**Now d/b/a Prairie Consulting Group**
Southeast Response & Remediation	**Now d/b/a SR&R Environmental**

ICN facility equipment deployment records are held at each facility and at NRC Headquarters in Great River, NY. OSRV equipment deployment records are maintained on board the vessels and both at NRC Headquarters and in the NRC Houston Marine Department office. These internal historical records identify each equipment deployment occurrence by:

- NRC Control No.
- Date of deployment
- Event description - actual spill incident, equipment training or exercise
- Type of environment - sheltered , protected or unsheltered
- Type of skimming system deployed
- Type and quantity of boom deployed

If you have any questions regarding this report, contact Charles Comerford at 631-224-9141. Please ensure individuals responsible for the PREP program in your organization receive this report. If you would like additional copies they are located on our Web site, which is www.nrcc.com under the client access portion. Widest dissemination of this document is encouraged.

Sincerely,

Steven A. Candito
President
National Response Corporation

NATIONAL RESPONSE CORPORATION

Regional Breakdown

Northeast Region
General Manager: John Hielscher
3500 Sunrise Highway - Suite T-103, Great River, NY 11739
(631)224-9141 Ext 142
States Covered:
Indiana, Michigan, Ohio, New York, Pennsylvania, Maryland, Delaware, New Jersey, Connecticut, Vermont, Massachusetts, Rhode Island, New Hampshire, Maine, West Virginia, Virginia

South Region
General Manager: Ray McCoy
818 Town & Country Blvd. - Suite 200, Houston, TX 77024
(281)606-4848
States Covered:
Texas, Louisiana, Arkansas, Oklahoma, Kansas, Nebraska, Colorado, New Mexico, Mississippi, Alabama

Southeast Region
General Manager: Jason DeSantis
104 River Lane, Ormond Beach, FL 32176
(386)441-7719
States Covered:
Kentucky, Tennessee, North Carolina, South Carolina, Georgia, Florida, Missouri, Illinois, Iowa, Minnesota, Wisconsin

West Coast Regional Breakdown (NRCES)
Pacific Northwest Region
PNW General Manager: Jim Riedel
1630 10th Ave., South – Suite 150, Seattle, WA 98108
(206)607-3000
States Covered: Washington, Oregon, Idaho, Montana, Wyoming, Hawaii, North Dakota, South Dakota

West Region
VP/General Manager: Todd Roloff
1805 Ferry Point Road, Alameda, CA 94501
(510)749-1390
States Covered: California, Nevada, Utah, Arizona

Regional Breakdown

Caribbean Region
General Manager: David Aviles
P.O. Box 9022750, San Juan, PR 00902
(787)789-2000
Islands Covered: Puerto Rico, St. Thomas, St. Croix, St. Lucia, Aruba

Virgin Islands
Regional Manager: Joe Schilling
8A Williams Fredriksted, St. Croix, West Virgin Islands 00840
Islands Covered: St. Croix (Hovensa)

Aruba
Regional Manager: James Haeghaert
Bungalow 251, First Ave., Seroe Colorado, San Nicholas, Aruba
Island Covered: Aruba

NATIONAL RESPONSE CORPORATION

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Northeast Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6" - 18"	Boom 19" - 42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP Northern New England	NRC - 0016	Searsport, ME	Bangor, ME	1,000'		1			1	
COTP Northern New England	NRC - 0016	Fore River So. Portland, ME	NRC Reliant So. Portland, ME		1,000'		1	1		
COTP Pittsburgh	NRC - 0016	Allegheny River Pittsburgh, PA	Pittsburgh, PA				1			
COTP New York	NRC - 0016	Lower NY Harbor, Gravesend Bay, NY	NRC Guardian Staten Island, NY		1,000'			1		
COTP Hampton Roads	NRC - 0016	Chesapeake River, VA	Norfolk, VA	2,000'		1			1	
COTP Northern New England	NRC - 0016	Penobscot River, Bucksport, ME	Bangor, ME	1,000'					1	
COTP Buffalo	NRC - 0016	Lake Ontario, Oswego Harbor, NY	Oswego, NY	1,000'		1				
COTP New York	MEG - 0020	Newburgh, NY	N/A	1,200'		1				
COTP Delaware Bay	MEG - 0020	Maurice River, NJ	N/A	6,000'			1			
COTP Northern New England	MEG - 0020	Lake Champlain, NY	N/A	1,100'					1	
COTP Baltimore	MEG - 0020	Baltimore, MD	N/A	1,000'					1	
COTP New York	MEG - 0020	West Haverstraw, NY	N/A	1,800'					1	

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Southeast Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6" - 18"	Boom 19" - 42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP Miami	NRC - 0016	Miami Harbor, Miami, FL	NRC Liberty Miami, FL		2,000'	1			1	
COTP Key West	NRC - 0016	Key West Harbor, Key West, FL	Key West, FL	2,000'			2			
COTP Upper Mississippi	NRC - 0016	Merrimac River, St. Louis, MO	Fenton, MO	4,000'			1		1	
COTP Ohio Valley	NRC - 0016	Paducah, KY	Paducah, KY Duluth, MN	3,100'					1	
COTP Ohio Valley	USES - 0038	Nashville, TN	N/A	1,000'						
COTP Lower Missippi	USES - 0038	Little Rock, AR	N/A	1,000'		1				
COTP Ohio Valley	USES - 0038	Nashville, TN	N/A	1,000'						
COTP Jacksonville	CBI - 0048	Port Canaveral, FL	N/A	1,000'						
COTP Miami	CBI - 0048	Port Everglades, FL	N/A	1,000'		1			1	
COTP Tampa	DES - 0037	Port of Tampa, FL	N/A	1,600'						
COTP Tampa	DES - 0037	Tampa Bay, FL	N/A	2,200'						

NATIONAL RESPONSE CORPORATION

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Southern Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6" - 18"	Boom 19" - 42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP Corpus Christi	NRC - 0016	Corpus Christi, TX	Corpus Christi, TX						1	2
COTP Corpus Christi	NRC - 0016	Corpus Christi, TX	Corpus Christi, TX							2
COTP Corpus Christi	NRC - 0016	Corpus Christi, TX	NRC Valiant, Corpus Christi, TX		1,600					
COTP Houston / Galveston	NRC - 0016	Gulf of Mexico Galveston, TX	NRC Admiral, Galveston, TX		1,900'					
COTP Houston / Galveston	NRC - 0016	Galveston Harbor Galveston, TX	NRC Admiral, Galveston, TX					1		
COTP Houston / Galveston	NRC - 0016	Galveston Harbor Galveston, TX	NRC Admiral, Galveston, TX					1		
COTP Houston / Galveston	NRC - 0016	Galveston Harbor Galveston, TX	NRC Admiral, Galveston, TX					1		
COTP Morgan City	NRC - 0016	Morgan City, LA	NRC Energy, Morgan City, LA				1	1	2	2
COTP Morgan City	NRC - 0016	Morgan City, LA	NRC Energy, Morgan City, LA		2,000'		1			
COTP Lower Mississippi	NRC - 0016	Harbor Bayou La Batre, MS	NRC Defender, Bayou La Batre, MS		1,000'					
COTP Lower Mississippi	NRC - 0016	Harbor Bayou La Batre, MS	NRC Defender, Bayou La Batre, MS				1	1		
COTP Mobile	USES - 0038	Birmingham, AL	N/A	1,100'		1				
COTP Mobile	USES - 0038	Mobile, AL	N/A	2,000'		2				
COTP New Orleans	USES - 0038	Venice, LA	N/A	2,000'		1				
COTP Lower Missippi	USES - 0038	Little Rock, AR	N/A	1,000'		1				
COTP Lower Missippi	ACME - 0010	Little Wewoka Creek	N/A	1,100'		4				
COTP Corpus Christi	MES - 0072	Ingelside, TX	N/A	1,000'						

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Western Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6"-18"	Boom 19"-42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP San Diego	NRC - 0016	San Diego Harbor, San Diego, CA	San Diego, CA	2,000'			1			
COTP San Diego	NRC - 0016	San Diego Harbor, San Diego, CA	San Diego, CA				1			
COTP Los Angeles	NRC - 0016	Port of Los Angeles, Los Angeles, CA	Los Angeles, CA		1,200'					
COTP Los Angeles	NRC - 0016	Port of Long Beach, Long Beach, CA	Long Beach, CA						2	
COTP Los Angeles	NRC - 0016	Port of Los Angeles, Los Angeles, CA	Los Angeles, CA		1,500'	1	1	1	1	
COTP Los Angeles	NRC - 0016	Port of Los Angeles, Los Angeles, CA	Los Angeles, CA		3,000'					
COTP Los Angeles	NRC - 0016	Port of Los Angeles, Los Angeles, CA	Los Angeles, CA		1,200'					
COTP San Francisco	NRC - 0016	Humboldt Bay, CA	San Francisco, CA		1,100'					
COTP San Francisco	NRC - 0016	Humboldt Bay, CA	San Francisco, CA		3,500'					
COTP San Francisco	NRC - 0016	Humboldt Bay, CA	San Francisco, CA		1,000'					
COTP San Francisco	NRC - 0016	Crissy Field, San Francisco, CA	Alameda, CA		2,700'			1		
COTP San Francisco	NRC - 0016	Pier 92, San Fransisco Bay, CA	Alameda, CA		1,000'		1			
COTP San Francisco	NRC - 0016	San Francisco Bay, CA	Alameda & Richmond		8,900'			1		
COTP San Francisco	NRC - 0016	Richmond Dock, Richmond, CA	Alameda, CA		3,700'	1				

NATIONAL RESPONSE CORPORATION

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Northwest Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6" - 18"	Boom 19" - 42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP Puget Sound	NRC - 0016	Ferndale, WA	NRC Columbia, Ferndale, WA						2	
COTP Puget Sound	NRC - 0016	Columbia River, WA	Neah Bay, WA		4,000'			2	1	
COTP Puget Sound	NRC - 0016	Forks, WA	Neah Bay, WA				1		1	
COTP Portland	NRC - 0016	Grays Harbor, WA	Ferndale, WA						1	
COTP Puget Sound	NRC - 0016	Neah Bay Straits	NRC Cape Flattery Neah Bay, WA						1	
COTP Puget Sound	NRC - 0016	Seattle, WA	Seattle, WA		1,000'			2		
COTP Puget Sound	NRC - 0016	Ferndale, WA	NRC Columbia, Ferndale, WA	1,200'						
COTP Puget Sound	NRC - 0016	Ferndale, WA	NRC Columbia, Ferndale, WA		1,000'					
COTP Puget Sound	NRC - 0016	Ferndale, WA	NRC Columbia, Ferndale, WA		1,000'					
COTP Puget Sound	NRC - 0016	Ferndale, WA	NRC Columbia, Ferndale, WA		1,300'					

NATIONAL RESPONSE CORPORATION

2011 ANNUAL EQUIPMENT DEPLOYMENT SUMMARY

NRC Caribbean Region

COTP Zone or EPA Region	Contractor Name and OSRO #	Deployment Location	NRC Equipment Storage Site	Boom 6" - 18"	Boom 19" - 42"	Skimmer Drum	Skimmer Floating Suction	Skimmer Oleophilic Belt	Skimmer Oleophilic Disc / Brush	Skimmer Oleophilic Rope Mop
COTP San Juan	NRC - 0016	Guayanilla Bay, PR	San Juan, PR						1	
COTP San Juan	NRC - 0016	Guayanilla Bay, PR	San Juan, PR			1	1		1	1
COTP San Juan	NRC - 0016	Guayanilla Bay, PR	San Juan, PR	1,000'					1	
N/A	NRC - 0016	Aruba	NRC Sentry, Aruba		1,000'					

ATTESTATION

I, Steven A. Candito, President of National Response Corporation (NRC), an Oil Spill Removal Organization (OSRO) with full OSRO classifications in all Captain of the Port Zones, for all operating environments within our Area of Service do hereby attest, based upon the information provided to me by the members of the NRC Independent Contractor Network, each of whom are responsible for similar attestations to their own clients under the National Preparedness for Response Exercise Program and based on my own personal knowledge, that boom and skimming systems, more than adequate to satisfy the OSRO field equipment deployment drill requirements of OPA '90 have been deployed on your behalf in the United States East Coast, Gulf Coast, West Coast, Inland River and Caribbean Regions within the most recent calendar year. Further that NRC-owned equipment is inspected and maintained under a formal preventive maintenance program. Personnel training requirements are met through a formal equipment deployment-training program. The personnel who deployed the equipment demonstrated their ability to successfully deploy and operate the equipment and the equipment was in good working order. Further, records of these deployments are maintained at our headquarters in Great River, New York, USA.

Date: 17 February 2012

Steven A. Candito
President
National Response Corporation

Attachment B

COTP Zone	Operating Environment	Facility MMPD	Facility WCD1	Facility WCD2	Facility WCD3	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WCD3
Corpus Christi - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Corpus Christi - DISTRICT 8	Inland	✓		✓	✓	✓	✓	✓	✓
Houston - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Houston - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓
Lower Mississippi - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Lower Mississippi - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓
Mobile - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Mobile - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓
Mobile (Panama City, FL) - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Mobile (Panama City, FL) - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓
Morgan City - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Morgan City - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓

New Orleans - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
New Orleans - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓
Port Arthur - DISTRICT 8	River or Canal	✓	✓	✓	✓	✓	✓	✓	✓
Port Arthur - DISTRICT 8	Inland	✓	✓	✓	✓	✓	✓	✓	✓

Dispersant Classifications:

No Dispersant Classifications

Marine Salvage and Firefighting COTP Operational Zones

No Marine Salvage and Firefighting COTP Operational Zones

Sites Registered With This Owner:

Display Report	Site Name	Located in COTP Zone	Contractor Status	Click To Print ☐ *(Select All)*
Display Report	CCA Site Three	**Not in a Known District - DISTRICT 0	Contracted Site	☐
Display Report	NES - Freeport	**Not in a Known District - DISTRICT 0	Contracted Site	☐
Display Report	SWS CRYSTAL RIVER	St. Petersburg - DISTRICT 7	Contracted Site	☐
Display Report	SWS FORT LAUDERDALE	Miami - DISTRICT 7	Contracted Site	☐
Display Report	SWS PINELLAS PARK	St. Petersburg - DISTRICT 7	Contracted Site	☐
Display Report	SWS SAVANAH	Savannah - DISTRICT 7	Contracted Site	☐
Display Report	Acme Products Company	Lower Mississippi - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Amelia	Morgan City - DISTRICT 8	Contracted Site	☐

Display Report	ASCO Berwick	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Cameron	Port Arthur - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Dulac	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Environmental Services	Port Arthur - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Fourchon 15	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Fourchon 16	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Intracoastal City	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Morgan City	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ASCO River Ridge	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Sabine Pass	Port Arthur - DISTRICT 8	Contracted Site	☐
Display Report	ASCO Venice	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Baton Rouge	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Beaumont	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Corpus Christi	Corpus Christi - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Decatur	Mobile - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Freeport	Corpus Christi - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Lake Charles	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Baker Tanks - Mobile	Mobile - DISTRICT 8	Contracted Site	☐
Display Report	Buffalo Marine Services	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Clean Channel Association	Houston - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - Baton Rouge	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - Belle Chasse	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - Fourchon	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - Houma	New Orleans - DISTRICT 8	Contracted Site	☐

Display Report	ES&H - Morgan City	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - New Iberia	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	ES&H - Venice	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	Florida Marine Transporters, I	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	Garner Environmental LaMarque	Houston - DISTRICT 8	Owned Site	☐
Display Report	Garner Environmental Port Arth	Port Arthur - DISTRICT 8	Owned Site	☐
Display Report	Garner Environmental Services,	Houston - DISTRICT 8	Owned Site	☐
Display Report	Houston Marine Service	Port Arthur - DISTRICT 8	Contracted Site	☐
Display Report	Houston Marine Services, Inc.	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Miller Environmental Service	Corpus Christi - DISTRICT 8	Contracted Site	☐
Display Report	NES - Baton Rouge	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	NES - Baytown	Houston - DISTRICT 8	Contracted Site	☐
Display Report	NES - Beaumont	Houston - DISTRICT 8	Contracted Site	☐
Display Report	NES - Corpus Christi	Corpus Christi - DISTRICT 8	Contracted Site	☐
Display Report	NES - Lake Charles	Port Arthur - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - Baton Rouge	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - Corpus Christi	Corpus Christi - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - Groves	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - LaPorte	Houston - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - Mississippi	New Orleans - DISTRICT 8	Contracted Site	☐
Display Report	Rain For Rent - Sulpher	Morgan City - DISTRICT 8	Contracted Site	☐
Display Report	SWS FORT WALTON	Mobile - DISTRICT 8	Contracted Site	☐
Display Report	SWS Montgomery	Mobile - DISTRICT 8	Contracted Site	☐
Display Report	SWS PANAMA CITY	Mobile - DISTRICT 8	Contracted Site	☐
Display Report	SWS PENSACOLA	Mobile - DISTRICT 8	Contracted Site	☐

Display Report	Waste Oil Collectors, Inc.	New Orleans - DISTRICT 8	Contracted Site	☐

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APPENDIX D

EMERGENCY RESPONSE PERSONNEL JOB DESCRIPTIONS AND GUIDELINES

The following job descriptions and guidelines are intended to be used as a tool to assist ERP members in their particular positions within the Incident Command System (ICS):

- Incident Commander
- Public Information Officer
- Liaison Officer
- Safety Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Situation Group Leader
- Logistics Section Chief
- Communications Group Leader
- Security/Medical Group Leader
- Supply/Ground Support Group Leader
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader
- Legal Group Leader
- Business Resumption Section Chief
- Repair Coordinator

INCIDENT COMMANDER

The Incident Commander (IC) manages all activities related to an emergency response and acts as Qualified Individual (QI). As such, the Incident Commander needs to be familiar with the contents of the Facility Response Plan (FRP), Oil Spill Response Plan (OSRP), Emergency Response Action Plan (ERAP), and the Spill Prevention Control and Countermeasure Plan (SPCC). The Incident Commander (IC) must also be familiar with the operation of the Incident Command System (ICS) and the Unified Command Structure (UCS).

The primary goal of this system is to establish and maintain control of the emergency response. If the emergency involves a multi-jurisdictional response (Federal and State), the Unified Command Structure (UCS) should be established. **Realize that the Federal On-Scene Coordinator (FOSC) does have the authority to override the Incident Commander and assume control of the response**. Every effort should be made to establish a collaborative relationship to manage the incident site with the appropriate responding agencies.

As soon as possible following an incident, a critique of the response shall be conducted and follow-up action items identified. Participants may include Operations Control personnel, Company supervisors, and employees and outside agencies involved in the response.

Responsibilities:

- Maintain Activity Log.
- Establish Incident Command/Unified Command Post.
- Activate necessary section(s) of the Incident Command System (ICS) to deal with the emergency. Fill out the appropriate section(s) of the Incident Command organization chart and post it at the Incident Command Center.
- Develop goals and objectives for response.
- Work with Safety Officer and Planning Section Chief to develop a Site Safety Plan (SSP).
- Approve, authorize, and distribute Incident Action Plan (IAP) and SSP.
- Conduct planning meetings and briefings with the section chiefs.
- As Qualified Individual coordinate actions with Federal On-Scene Coordinator (FOSC) and State On-Scene Coordinator (SOSC).
- In a multi-jurisdictional response, ensure all agencies are represented in the ICS.
- Coordinate /approve media information releases with the FOSC, SOSC, and Public Information Officer (PIO).
- Keep management informed of developments and progress.
- Authorize demobilization of resources as they are no longer needed.
- Complete Incident Debriefing Form

PUBLIC INFORMATION OFFICER

The Public Information Officer (PIO) provides critical contact between the media/public and the emergency responders. The PIO is responsible for developing and releasing information about the incident to the news media, incident personnel, appropriate agencies and public. When the response is multi-jurisdictional (involves the federal and state agencies), the PIO must coordinate gathering and releasing information with these agencies.

The PIO needs to communicate that the Company is conducting an effective response to the emergency. The PIO is responsible for communicating the needs and concerns of the public to the Incident Commander (IC).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from IC.
- Participate in all planning meetings and briefings.
- Obtain outside information that may be useful to incident planning.
- Develop goals and objectives regarding public information.
- Arrange for necessary workspace, materials, telephones and staffing for Public Information Center (PIC).
- Establish a PIC, ensuring all appropriate agencies participate.
- Provide a single point of media contact for the IC.
- Coordinate media access to the response site as approved by the IC.
- Obtain approval for release of information from the IC.
- Arrange for meetings between media and emergency responders.
- Maintain list of all media present.
- Participate in Post Incident Review.

LIAISON OFFICER

If a Unified Command Structure is not established, a Liaison Officer is appointed as the point of contact for personnel assigned to the incident from assisting or cooperating agencies.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in planning meetings and briefings.
- Identify and maintain communications link with agency representatives, assisting, and coordinating agencies.
- Identify current or potential inter-organizational issues and advise IC as appropriate.
- Coordinate with Legal Group Leader and Public Information Officer (PIO) regarding information and documents released to government agencies.
- Participate in Post Incident Review

SAFETY OFFICER

The Safety Officer is responsible for assessing and monitoring hazardous and unsafe situations at the emergency response site(s). The Safety Officer must develop measures that assure the safety of the public and response personnel. This involves maintaining an awareness of active and developing situations, ensuring the preparation and implementation of the Site Safety Plan (SSP) and assessing safety issues related to the Incident Action Plans (IAP).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Develop, implement, and disseminate SSP with IC and section chiefs.
- Participate in planning meetings and briefings.
- Establish safety staff if necessary.
- Identify emergency contact numbers. Fill out emergency contact chart and post in the Incident Command Center.
- Conduct safety briefings with all emergency responders.
- Investigate accidents that have occurred during emergency response.
- Ensure proper hazard zones are established.
- Ensure all emergency responders have appropriate level of training.
- Ensure proper Personal Protective Equipment (PPE) is available and used.
- Advise Security/Medical Group Leader concerning PPE requirements.
- Ensure emergency alarms/warning systems are in place as needed.
- Participate in Post Incident Review

OPERATIONS SECTION CHIEF

The Operations Section Chief is responsible for the management of all operations applicable to the field response and site restoration activities. Operations directs field activities based on the Incident Action Plan (IAP) and Site Safety Plan (SSP).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Operations Section.
- Develop operations portion of IAP.
- Supervise the implementation of the IAP.
- Make or approve expedient changes to the IAP.
- Request resources needed to implement IAP.
- Approve list of resources to be released.
- Ensure safe tactical operations.
- Establish a staging area for personnel and equipment.
- Confirm first responder actions.
- Confirm the completion of rescue/evacuation and administering of first aid.
- Confirm site perimeters have been established.
- Coordinate activities of public safety responders, contractors, and mutual assistance organizations.
- Participate in Post Incident Review

STAGING GROUP LEADER

The Staging Group Leader is responsible for managing all activities within the staging area(s). The Staging Group Leader will collect, organize, and allocate resources to the various response locations as directed by Operations Section Chief.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Participate in Operations' planning meetings and briefings.
- Advise Operations Section Chief of equipment location and operational status.
- Periodically advise Operations Section Chief on inventory status of consumable items (sorbent pads, sorbent boom, etc.).
- Coordinate with Logistics Section Chief regarding inbound equipment, personnel, and supplies.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Establish check-in function and inventory control as appropriate.
- Allocate personnel/equipment to site(s) as requested.
- Establish and maintain boundaries of staging area(s).
- Demobilize/relocate staging area as needed.
- Post signs for identification and traffic control.
- Participate in Post Incident Review

REPAIR GROUP LEADER

The Repair Group Leader is responsible for supervising the repair and restoration of pipeline facilities.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Periodically advise Operations Section Chief on status of restoration activities.
- Conduct frequent hazard assessments and coordinate safety needs with Operations Section Chief and Safety Officer.
- Participate in Operations' planning meetings and briefings.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Conduct facility restoration activities in accordance with Company procedures, Site Safety Plan (SSP) and IAP.
- Determine and request additional materials, equipment, and personnel as needed.
- Ensure all equipment is decontaminated prior to being released.
- Participate in Post Incident Review

CONTAINMENT GROUP LEADER

The Containment Group Leader is responsible for supervising the containment and recovery of spilled product and contaminated environmental media both on land and on water.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Participate in Operations' planning meetings and briefings.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Conduct activities in accordance with the IAP.
- Assess overall situation for containment and recovery needs and supervise group activities.
- Periodically advise the Operations Section Chief on the status of containment and recovery actions.
- Ensure hazard zones are established and maintained.
- Ensure adequate communication equipment for the containment group response.
- Determine and request additional resources as needed.
- Participate in Post Incident Review

PLANNING SECTION CHIEF

The Planning Section Chief is responsible for collecting, evaluating, and disseminating information related to the current and future events of the response effort. The Planning Section Chief must understand the current situation; predict the future course of events; predict future needs; develop response and cleanup strategies; and review the incident once complete.

The Planning Section Chief must coordinate activities with the Incident Commander (IC) and other Section Chiefs to ensure that current and future needs are appropriately handled.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the IC.
- Establish and maintain communication with IC and other Section Chiefs.
- Advise IC on any significant changes of incident status.
- Conduct planning meetings and briefings for Planning section.
- Coordinate and provide input to the preparation of the Incident Action Plan (IAP).
- Participate in Incident Command planning meetings and briefings.
- In a multi-jurisdictional response, ensure that all agencies are represented in the Planning Section.
- Coordinate future needs for the emergency response.
- Determine response personnel needs.
- Determine personnel needs and request personnel for Planning section.
- Assign technical specialists (archaeologists, historians, biologists, etc.) where needed.
- Collect and analyze information on the situation.
- Assemble information on alternative response and cleanup strategies.
- Ensure situation status unit has a current organization chart of the Incident Command Organization.
- Provide periodic spill movement/migration prediction.
- Participate in Post Incident Review

ENVIRONMENTAL GROUP LEADER

The Environmental Group Leader is responsible for ensuring that all areas impacted by the release are identified and cleaned up following company and regulatory standards. The Environmental Group Leader supports Planning and Operations to minimize and document the environmental impact of the release.

The Environmental Group Leader must plan for future site considerations such as long-term remediation and alternative response strategies in unusually sensitive areas. In a Unified Command Structure (UCS), representatives from the federal and state responding agencies will be included in this group.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Planning Section Chief.
- Participate in Planning section meetings and briefings.
- Participate in development of Planning's portion of Incident Action Plan (IAP).
- Coordinate environmental activities with responding regulatory agencies.
- Periodically advise the Planning Section Chief on status of group activities.
- Request additional personnel/specialists to support response effort.
- Determine environmental group resource needs.
- Identify and develop a prioritized list of natural, cultural, and economic (NCE) resources at risk.
- Initiate and coordinate Natural Resources Damage Assessment (NRDA) activities.
- Develop a management plan for recovered contaminated media and ensure coordination with Containment Group Leader.
- Ensure proper management of injured/oiled wildlife.
- Determine alternative cleanup strategies for response.
- Participate in Post Incident Review

SITUATION GROUP LEADER

The Situation Group Leader is responsible for the collection, evaluation, display, and dissemination of all information related to the emergency response effort. The Situation Group Leader must establish and maintain communications with all portions of the Incident Command and the response site in order to collect the information. The Situation Group Leader also attempts to predict spill movement/migration and identifies areas that may be impacted by the emergency.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Planning Section Chief.
- Participate in Planning section meetings and briefings.
- Participate in development of Planning's portion of Incident Action Plan (IAP).
- Maintain a master list of response resources ordered, in staging and in use.
- Collect and display current status of requested response resources.
- Collect and display current status of resources, current spill location, personnel, and weather.
- Analyze current information to determine spill trajectory and potential impacts.
- Disseminate information concerning the situation status upon request from the emergency responders.
- Provide photographic services and maps.
- Establish periodic reconnaissance of impacted area to support information needs.
- Collect information on the status of the implementation of Incident Action Plans. Display this information in the Incident Command Center.
- Participate in Post Incident Review

LOGISTICS SECTION CHIEF

The Logistics Section Chief is responsible for procuring facilities, services, and material in support of the emergency response effort.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Logistics section.
- Participate in the preparation of the Incident Action Plan (IAP).
- Identify service and support requirements for planned operations.
- Identify sources of supply for identified and potential needs.
- Advise IC on current service and support requirements.
- Procure needed materials, equipment and services from sources by means consistent with the timing requirements of the IAP and Operations.
- Ensure all purchases are documented.
- Participate in Post Incident Review

COMMUNICATIONS GROUP LEADER

The Communications Group Leader is responsible for ensuring that the Incident Command and emergency responders have reliable and effective means of communication. This may involve activation of multiple types of communications equipment and coordination among multiple responding agencies and contractors.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on status of communications group.
- Participate in Logistics section planning meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Establish an Incident Command communications center.
- Ensure Incident Commander (IC) has communications compatible with other response agencies.
- Identify all communications circuits/equipment used by emergency responders and keep a chart updated with this information.
- Determine the type and amount of communications required to support the response effort (computer, radio, telephone, fax, etc.).
- Ensure timely establishment of adequate communications equipment and systems.
- Advise Logistics Section Chief on communications capabilities/limitations.
- Establish an equipment inventory control system for communications gear.
- Ensure all equipment is tested and repaired.
- Participate in Post Incident Review

SECURITY/MEDICAL GROUP LEADER

The Security/Medical Group Leader is responsible for developing a plan to deal with medical emergencies, obtaining medical aid and transportation for emergency response personnel, and preparation of reports and records.

The Security/Medical Group Leader is responsible for providing safeguards needed to protect personnel and property from loss or damage. The Security/Medical Group Leader also controls access to the emergency site and Incident Command Center.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on the status of security and medical problems.
- Participate in Logistics meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Determine and develop security/medical support plan needs.
- Request medical or security personnel, as needed.
- Work with Safety Officer to identify/coordinate local emergency medical services.
- Coordinate with Safety Officer and Operations Section Chief to establish the Site Safety Plan (SSP) with site boundaries, hazard zones, escape routes, staging areas, Command Center and Personal Protective Equipment (PPE) requirements.
- Coordinate/develop an identification system in order to control access to the incident site.
- Participate in Post Incident Review

SUPPLY/GROUND SUPPORT GROUP LEADER

The Supply/Ground Support Group Leader is responsible for procurement and the disposition of personnel, equipment, and supplies; receiving and storing all supplies for the incident; maintaining an inventory of supplies; and servicing non-expendable supplies and equipment. The Supply/Ground Support Group Leader supports the following: transportation of personnel; supplies, food, equipment; and fueling, service, maintenance and repair of vehicles and equipment.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on status of supply/ground support group.
- Participate in Logistics meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Communicate with Staging Group Leader concerning material, equipment and personnel that are inbound and the approximate time of arrival.
- Coordinate with other Section Chiefs to ascertain the priority of needed materials, equipment and services.
- Coordinate with Finance Section Chief to establish accounts, purchase orders, AFEs and procedures as necessary.
- Establish an inventory control system for materials and equipment.
- Maintain roads, when necessary.
- Participate in Post Incident Review

FINANCE SECTION CHIEF

The Finance Section Chief is responsible for accounting, legal, right-of-way and risk management functions that support the emergency response effort. In this role, the primary responsibility is supporting the Command Staff and Logistics Section matters pertaining to expenses during and following the emergency response.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Finance section.
- Participate in preparation of the Incident Action Plan (IAP).
- Participate in planning meetings.
- Participate in Unified Command System (UCS) as incident warrants.
- Request assistance of corporate accounting, legal, right-of-way or risk management as needed.
- Assist with contracting administration.
- Participate in Post Incident Review

ACCOUNTING GROUP LEADER

The Accounting Group Leader is responsible for accumulating and dispensing funding during an emergency response. All charges directly attributed to the incident should be accounted for in the proper charge areas.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Make recommendations for cost savings to Finance and Logistics Section Chiefs.
- Establish accounts as necessary to support the Logistics section.
- Ensure all invoices are documented, verified, and paid accordingly.
- Involve corporate accounting group for assistance as necessary.
- Participate in Post Incident Review

CLAIMS GROUP LEADER

The Claims Group Leader is responsible for managing all risk management and right-of-way issues at, during, and following an emergency response. It is important that all claims are investigated and handled expediently.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Periodically inform affected parties of status of emergency response.
- Review and authorize payment of all claims.
- Provide needs of evacuated persons or groups.
- Purchase or acquire property.
- Inform and update necessary insurance groups and underwriters.
- Involve corporate Risk Management or Land, Records, and Claims as needed.
- Participate in Post Incident Review

LEGAL GROUP LEADER

The Legal Group Leader is responsible for advising the Incident Command Staff and Section Chiefs on all matters that may involve legal issues.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief of status.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Conduct investigations per Incident Commander's (IC) request.
- Provide skilled negotiators.
- Communicate to all affected emergency response personnel if work product is declared "Attorney-Client Privilege. "
- Participate in Post Incident Review

BUSINESS RESUMPTION SECTION CHIEF

The Business Resumption Section Chief is responsible for managing and directing activities of the repair crews and contractors.

Responsibilities:

- Establish and direct the repairs activities.
- Ensure that all work is done in a manner to ensure the safety of all employees and the public.
- Establish and direct any required staging activities.
- Participate in Post Incident Review

REPAIR COORDINATOR

The Repair Coordinator is responsible for the timely, efficient, and safe repair of the damaged pipeline segment so that loss of service will be as brief as possible without compromising safety or integrity of repair. Ensure that temporary and/or permanent repair of the affected asset is done in accordance with approved methods.

Responsibilities:

- Determine extent and cause of damage.
- Obtain necessary materials, personnel and equipment to repair damage.
- Plan and execute repairs.
- Verify that repairs are complete and sound using proven test methods (x-ray, hydrostatic test or other accepted methods) and in compliance with DOT requirements.
- Supervise completion of repair by the use of proper back-fill materials and techniques.
- Return the ROW to acceptable condition.
- Inform the Incident Commander when pipeline is ready for return to service.
- Coordinate activities with HES and DOT representatives.
- Participate in Post Incident Review

Appendix E- Site Diagrams/Maps

- Site Vicinity Map
- Planning Distance- 15 Mile Radius
- Current Facility Plot Plan
- Facility Drainage
- Evacuation Diagram/Collection Boom Locations
- Lower Neches Valley Authority (LNVA) Water System Water Intakes
- Environmental Sensitive Area's (Texas General Land Office Spill Toolkit)
- Geographic Response Maps (Texas General Land Office Spill Toolkit)

SCALE - 1 : 24,000

N

W E

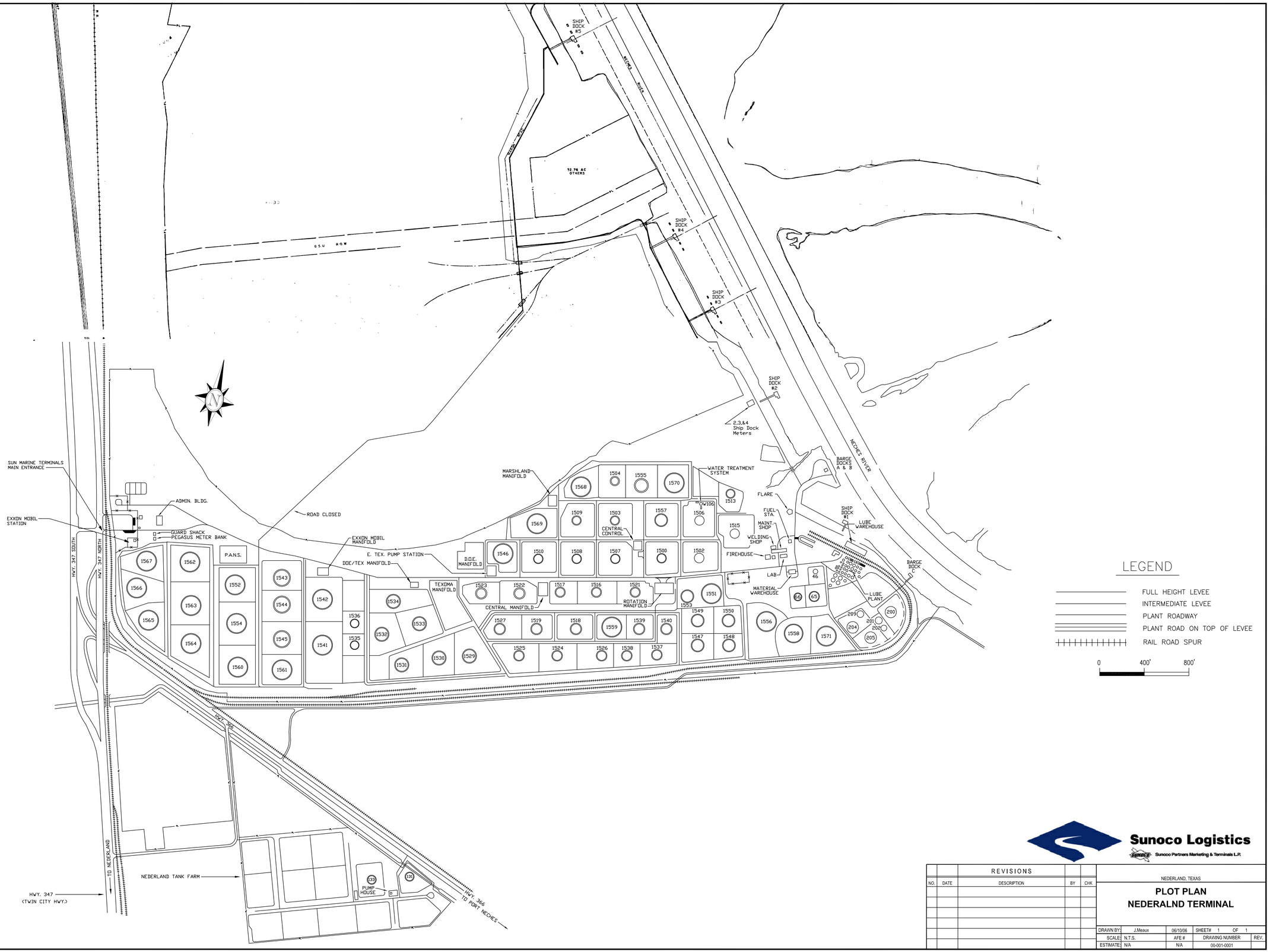
USGS 7.5 MINUTE TOPOGRAPHIC SURVEY MAP
NEDERLAND, TEXAS

Longitude W 94° 00' 11"
Latitude N 29° 59' 22"

anteagroup

FIGURE NO.:	**FIGURE 1**	
FIGURE NAME:	**Topographic Site Map**	
CLIENT:	Sunoco Marketing & Terminals	JOB NO.: 2620902913
SITE:	Nederland, TX	DATE: 11/2012

Nederland Terminal 15 Mile Radius



Sunoco Logistics

Sunoco Partners Marketing & Terminals L.P.

REVISIONS				
NO.	DATE	DESCRIPTION	BY	CHK

NEDERLAND, TEXAS

PLOT PLAN
NEDERALND TERMINAL

DRAWN BY:	J.Meaux	06/10/06	SHEET# 1 OF 1	
SCALE:	N.T.S.	AFE #	DRAWING NUMBER	REV.
ESTIMATE:	N/A	N/A	00-001-0001	

NORTH AREA

MARINE TERMINALS
N ENTRANCE

MOWER AREA

DIESEL TANK

ADMIN. BLDG.

ROAD ELEVATED

DITCH

CHOPS METER BANK

OUTFALL

SERVICE ROAD

ELECTRIC SUB STATION

DITCH

MARSHLAND MANIFOLD

OUT FALL WITH PUMP

OUTFALL

SERVICE ROAD

DITCH

NAPHTHA TANK

SHIP DOCK #2

MRS #001

OIL/WATER SEPARATOR TANK

OUTFALL #002

FLARE

OWS(2)

NAPHTHA TANK

BARGE DOCKS A & B

NECHES RIVER

GAS TANK

DIESEL TANK

SHIP DOCK

WAREHOUSE

TOTE STORAGE

DRUM STORAGE

RAIL CAR UNLOADING AREA

OOS TANK

DIESEL TANKS #1 & #2

DIESEL TANK #3

METHANOL TANK

NAPHTHA TANK

SERVICE ROAD

DITCH

MATERIAL WAREHOUSE

FIREHOUSE

CENTRAL CONTROL

WASTE WATER TANK

WASTE WATER TANK

DITCH

HWY. 366

RAIL CAR STAGING AREA

ABOVE GROUND PIPING

NEDERLAND TANK FARM

RETENTION PONDS

TRUCK UPLOADING SPOT

OUTFALL #005

VALVE

HWY. 347
(TWIN CITY HWY)

TO NEDERLAND

HWY. 366
TO PORT NECHES

LEGEND

- FULL HEIGHT LEVEE
- INTERMEDIATE LEVEE
- PLANT ROADWAY
- PLANT ROAD ON TOP OF LEVEE
- RAIL ROAD SPUR
- LEVEE DRAIN & VALVE
- CULVERT DRAIN
- TRANSFORMER
- DRAINAGE DIRECTION
- CULVERT

0 800
SCALE IN FEET

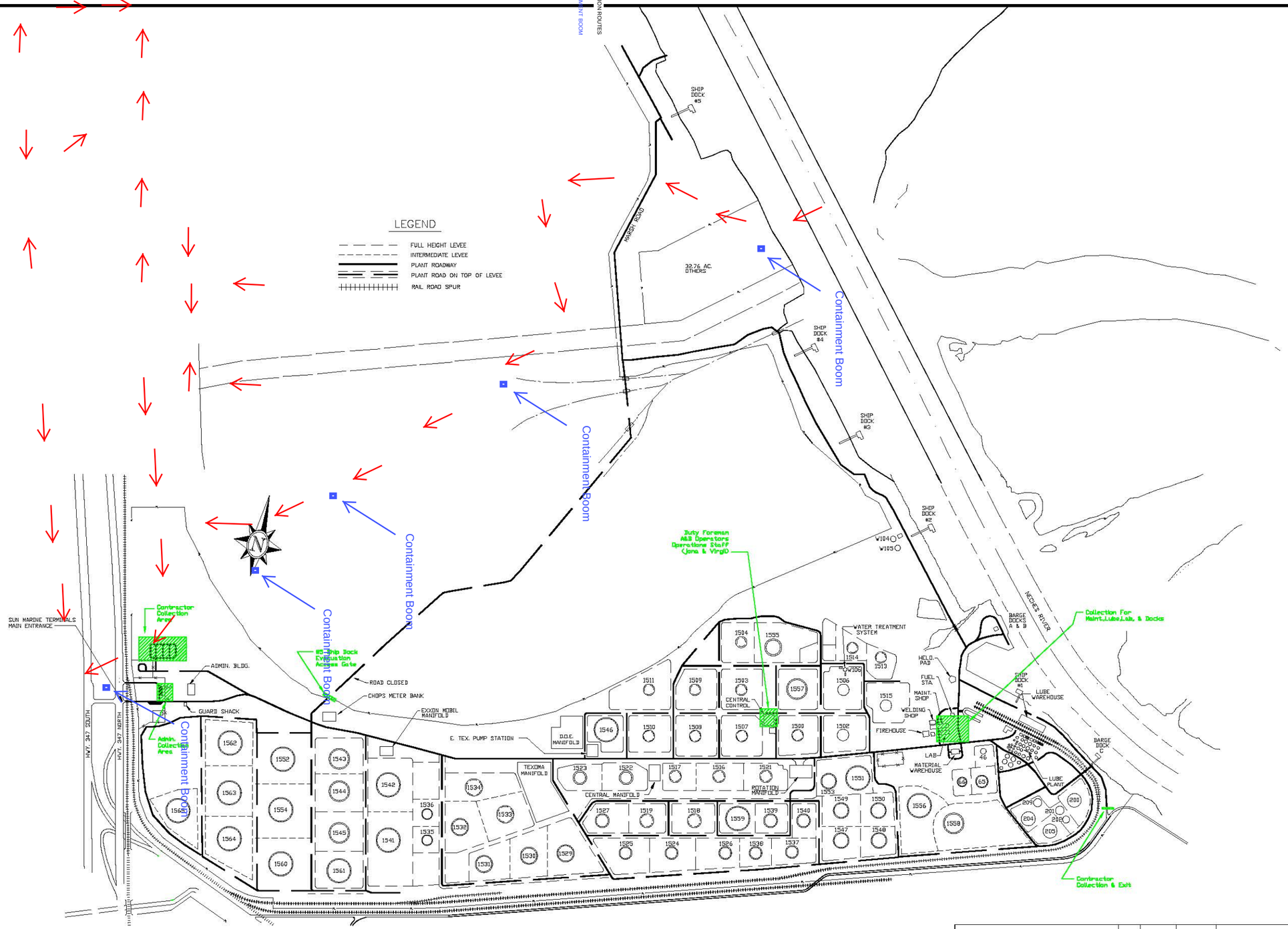
FIGURE 2A
SITE MAP

SUNOCO PARTNERS MARKETING & TERMINALS L.P.

NEDERLAND, TEXAS

PROJECT NO.	PREPARED BY	DRAWN BY
26209-0291-3	TL	DR
DATE	REVIEWED BY	FILE NAME
11/9/12		2620902913

anteagroup



REV.	DATE	APP#	DESCRIPTION	APPROVAL

ENGINEERING RECORD	
DRAWN BY	J.MEAUX
CHECKED BY	N/A
APPROVED BY	N/A
DATE	12/13/2007
SCALE	N.T.S.

Sunoco Logistics Partners L.P.

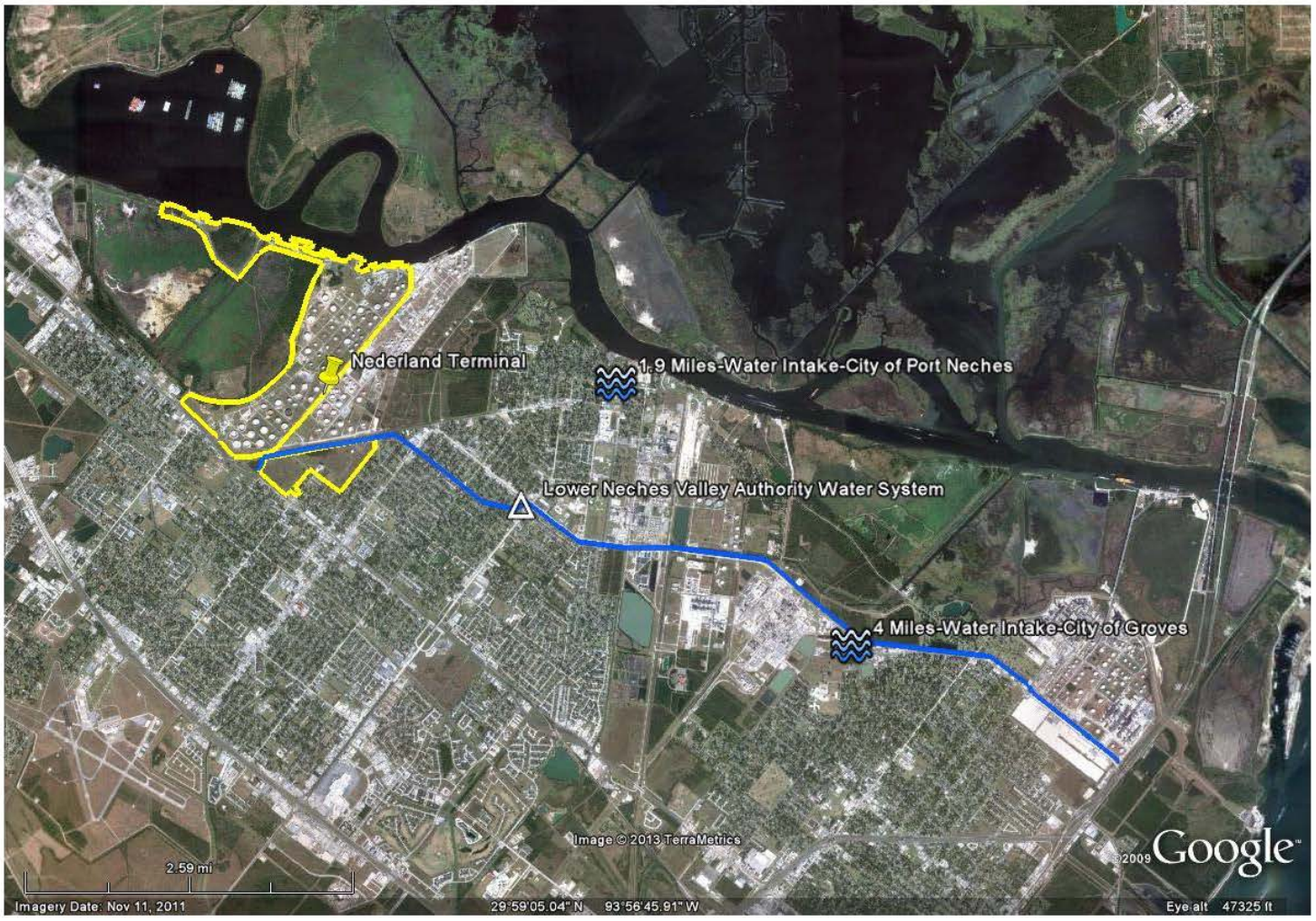
NEDERLAND - 00
NEDERLAND TERMINAL
PLOT PLAN
EVACUATION COLLECTIONS SITES

JEFFERSON

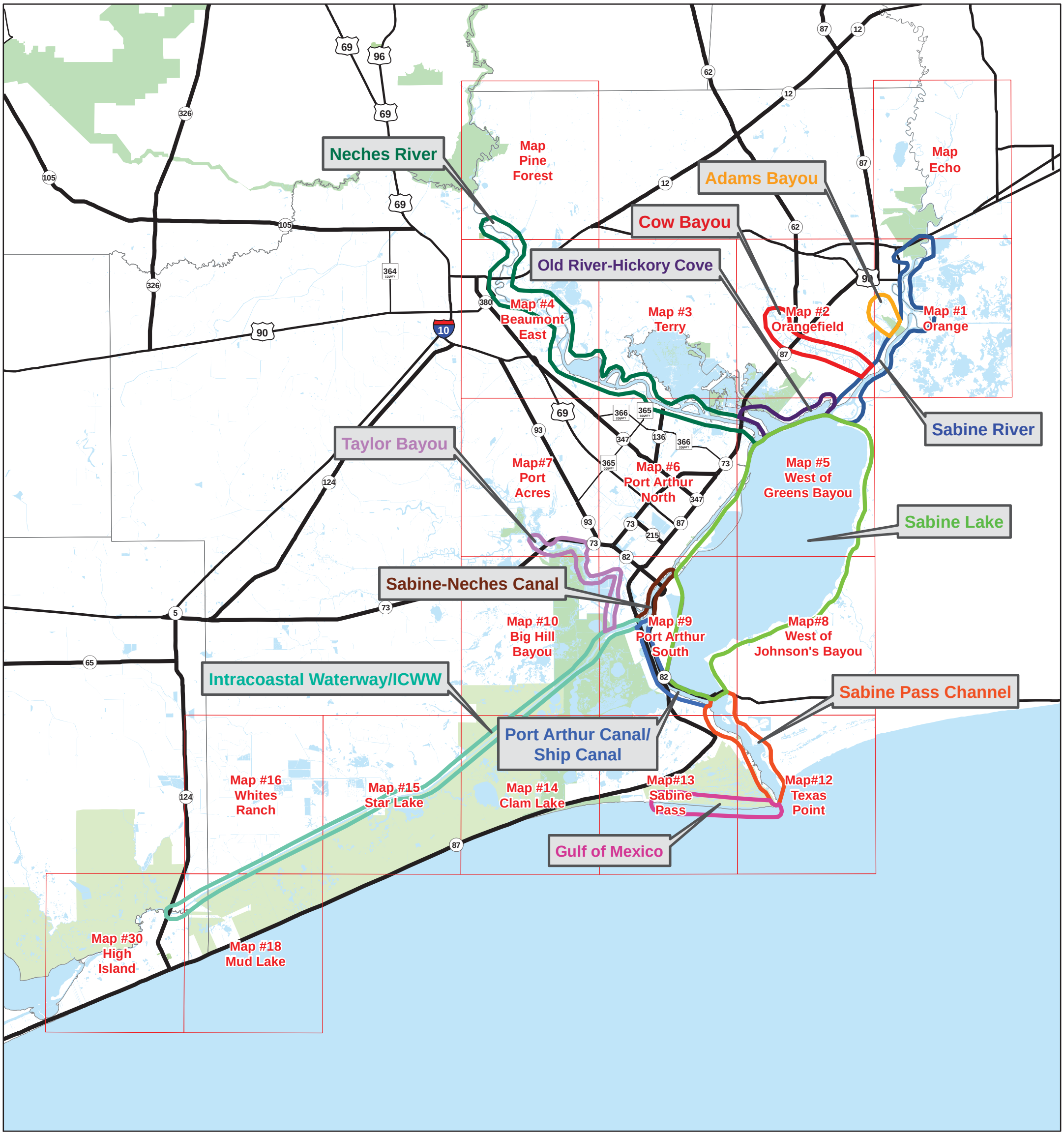
OLD DRAWING NO.

DWG. NO. N_NEDE-00_FRP000100

REV. NO. 0


Nederland Terminal
1.9 Miles-Water Intake-City of Port Neches
Lower Neches Valley Authority Water System
4 Miles-Water Intake-City of Groves
Image © 2013 TerraMetrics
2009 Google
2.59 mi
Imagery Date: Nov 11, 2011
29°59'05.04" N 93°56'45.91" W
Eye alt 47325 ft

MSU Port Arthur
Geographic Response Plan (GRP) Index Map



TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

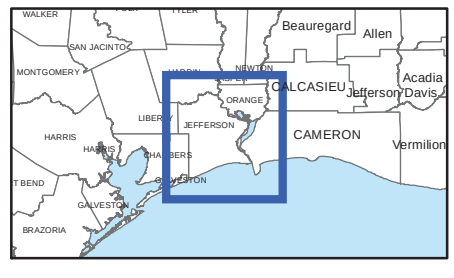
N
W E
S

0 4 8
Miles

0 4 8
Nautical Miles

0 20,000 40,000
Feet

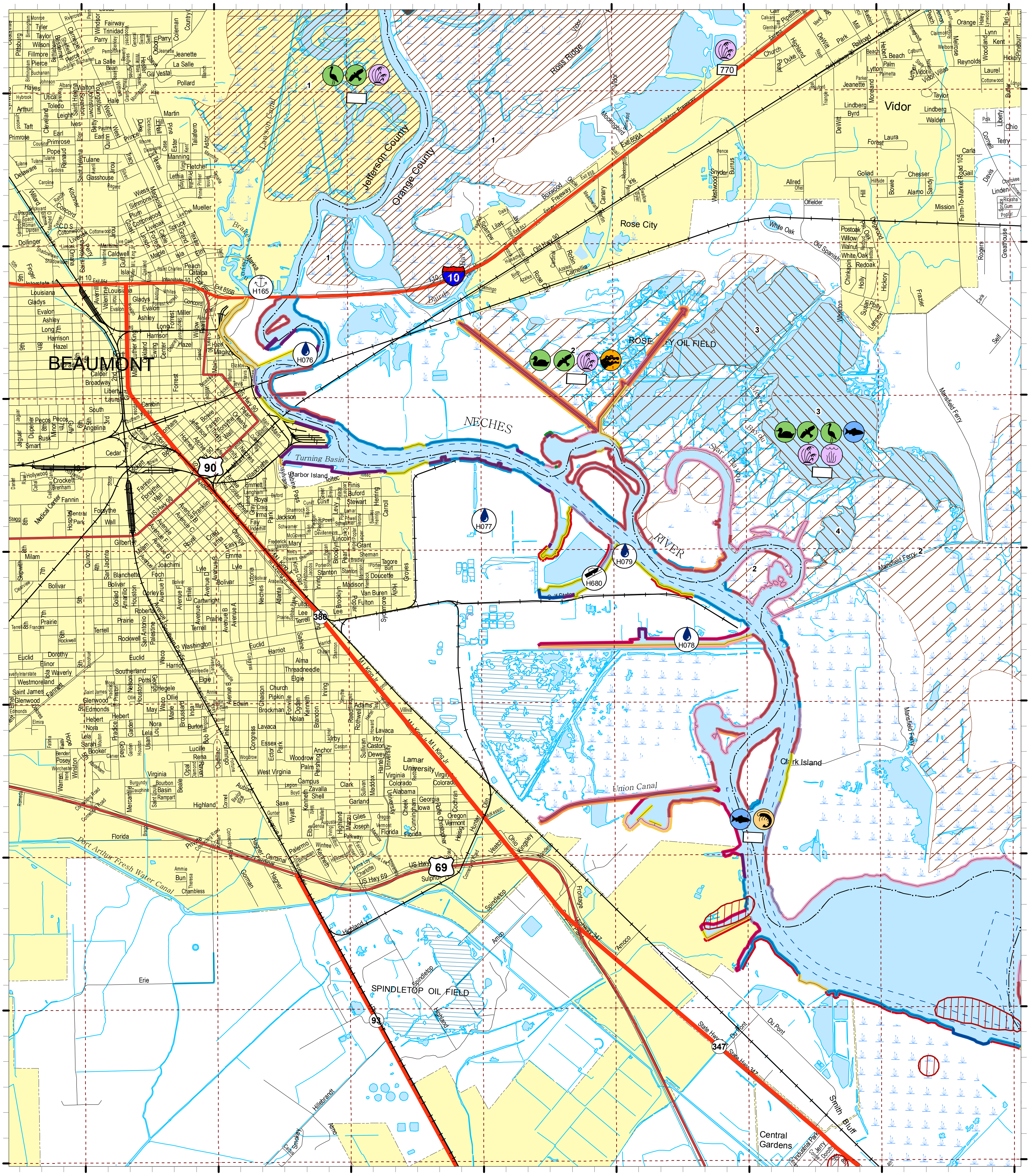
0 8 16
Kilometers



BEAUMONT EAST

DATA

ACP

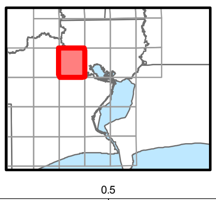


(BEAUMONT WEST)

(TERRY, p.3)

(PORT ACRES, p.7)

TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE



Oil Spill Planning and Response Atlas
Upper Coast of Texas
Summer, 2008

The Texas General Land Office makes no representations or warranties regarding the accuracy or completeness of the information depicted on this map or the data from which it was produced. This map is not suitable for navigational purposes and does not purport to depict boundaries of private and public land.

0 0.5 1 Miles

0 0.5 1 Nautical Miles

0 2,500 5,000 Feet

0 1 2 Kilometers

Depth Soundings in Feet

PRIORITY PROTECTION AREAS
- HIGH
- MEDIUM
- LOW

HUMAN-USE FEATURES
- Water Intake Point
- Marina
- Boat Ramps

ENVIRONMENTAL SENSITIVITY INDEX
- 10D - Mangrove Marsh
- 10C - Freshwater Swamps
- 10B - Freshwater Marshes
- 10A - Salt and Brackish Marshes
- 9 - Sheltered Tidal Flats
- 8C - Sheltered Scarps
- 8D - Sheltered Rocky/Karst Shores
- 8B - Sheltered Riprap Structures
- 8A - Sheltered Solid Manmade Structures
- 7 - Exposed Tidal Flats
- 6B - Exposed Riprap Structures
- 6A - Gravel or Shell Beaches
- 5 - Mixed Sand and Gravel or Shell Beaches
- 4 - Coarse-grained Sand Beaches
- 3B - Scarps and Steep Slopes in Sand
- 3A - Fine-Grained Sand Beaches
- 2B - Wave-cut Clay Platforms
- 2A - Scarps and Steep Slopes in Clay
- 1 - Exposed Walls and Other Solid Structures

- Counties TCEQ
- Municipal
- Bird Rookery

PORT ARTHUR NORTH

(TERRY, p.3)

DATA ACP

HUMAN-USE FEATURES

- Water Intake Point
- Coast Guard Station
- Boat Ramps
- Heliports

PRIORITY PROTECTION AREAS

- HIGH
- MEDIUM
- LOW

ENVIRONMENTAL SENSITIVITY INDEX

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- 7 - Exposed Tidal Flats
- 6B - Exposed Riprap Structures
- 6A - Gravel or Shell Beaches
- 5 - Mixed Sand and Gravel or Shell Beaches
- 4 - Coarse-grained Sand Beaches
- 3B - Scarps and Steep Slopes in Sand
- 3A - Fine-Grained Sand Beaches
- 2B - Wave-cut Clay Platforms
- 2A - Scarps and Steep Slopes in Clay
- 1 - Exposed Walls and Other Solid Structures

- State Parks/WMA
- Counties TCEQ
- Municipal
- Bird Rookery

TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

Oil Spill Planning and Response Atlas
Upper Coast of Texas
Summer, 2008

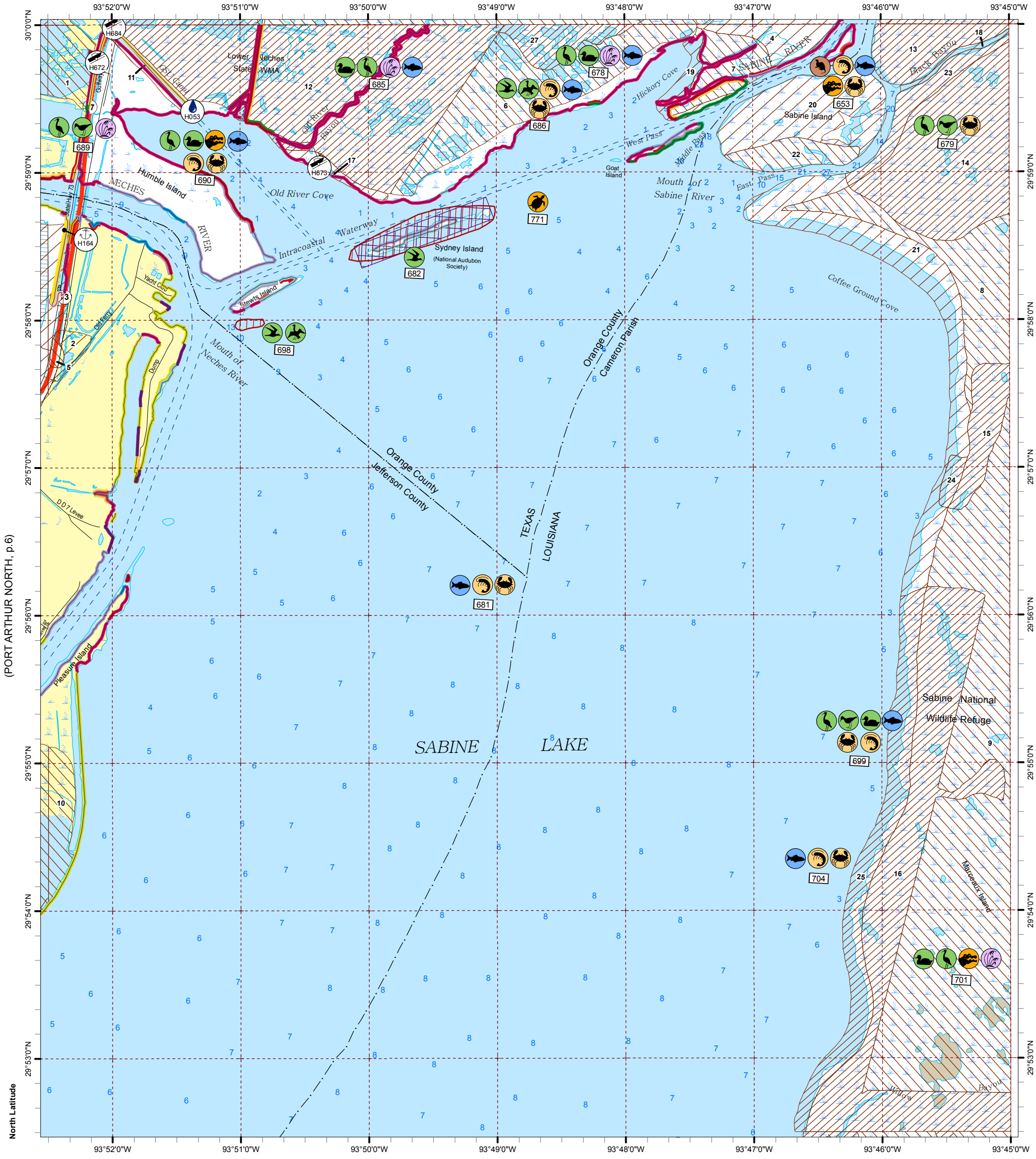
Miles 0 0.5 1
Nautical Miles 0 0.5 1
Feet 0 2,500 5,000
Kilometers 0 1 2

Depth Soundings in Feet

WEST OF GREENS BAYOU

(ORANGEFIELD, p.2)

DATA ACP

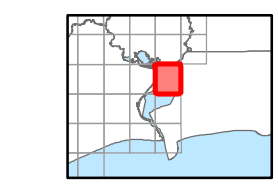


(PORT ARTHUR NORTH, p.6)

(WEST OF JOHNSON'S BAYOU, p.8)

TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

Oil Spill Planning and Response Atlas
Upper Coast of Texas
Summer, 2008



Depth Soundings in Feet

PRIORITY PROTECTION AREAS
- HIGH
- MEDIUM
- LOW

HUMAN-USE FEATURES
- Water Intake Point
- Marina
- Boat Ramps

ENVIRONMENTAL SENSITIVITY INDEX
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- 6B - Exposed Riprap Structures
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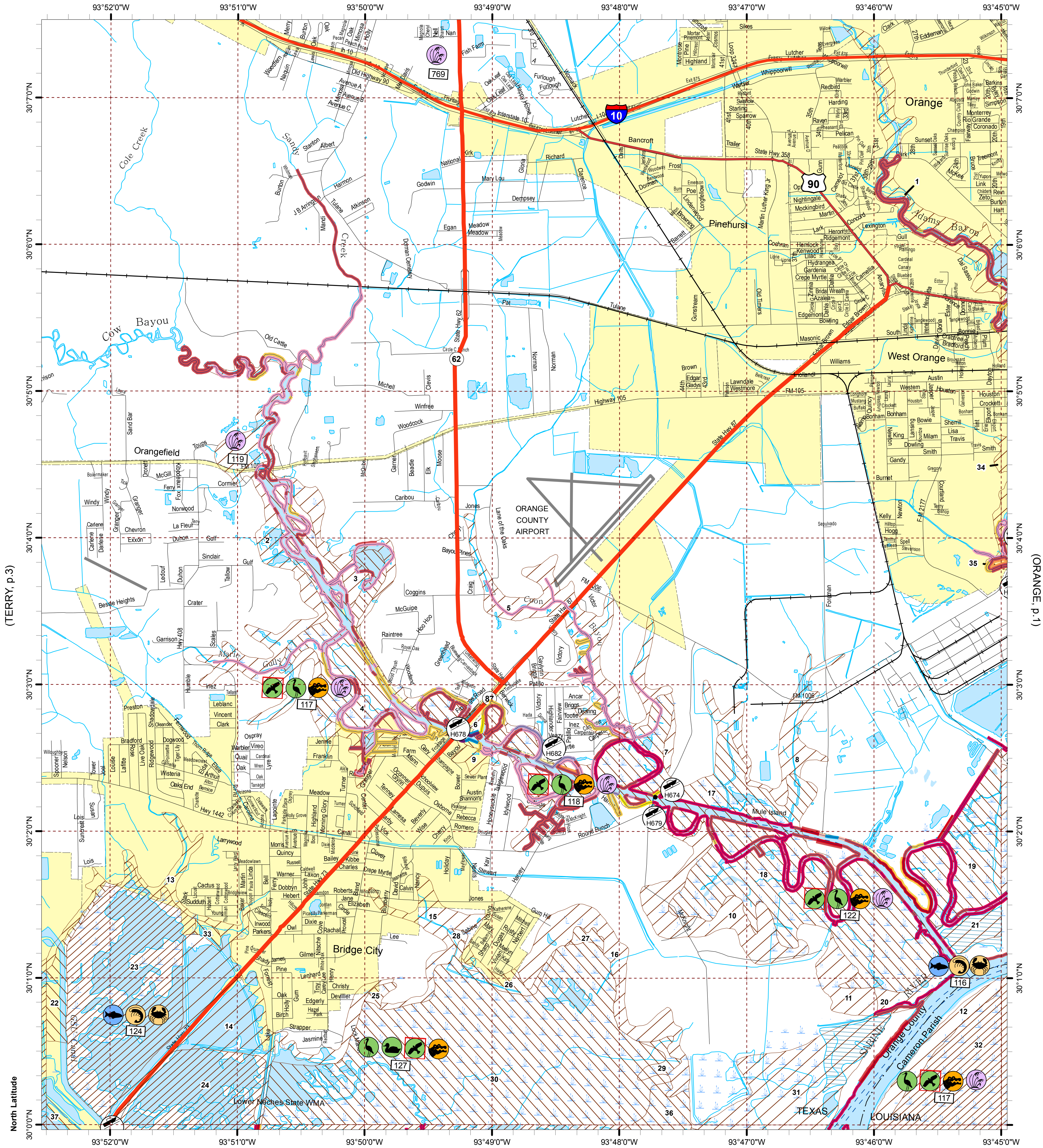
- 5 - Mixed Sand and Gravel or Shell Beaches
- 4 - Coarse-grained Sand Beaches
- 3B - Scarps and Steep Slopes in Sand
- 3A - Fine-Grained Sand Beaches
- 2B - Wave-cut Clay Platforms
- 2A - Scarps and Steep Slopes in Clay
- 1 - Exposed Walls and Other Solid Structures

- Audubon Sanctuaries
- Counties TCEQ
- Municipal
- Bird Rookery

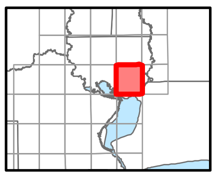
ORANGEFIELD

(PORT ARTHUR NORTH, p.6)

DATA ACP



West Longitude



Oil Spill Planning
and Response Atlas
Upper Coast of Texas
Summer, 2008

0 0.5 1
Miles

0 0.5 1
Nautical Miles

0 2,500 5,000
Feet

0 1 2
Kilometers

Depth Soundings in Feet

PRIORITY PROTECTION AREAS
- HIGH
- MEDIUM
- LOW

HUMAN-USE FEATURES

- Boat Ramps

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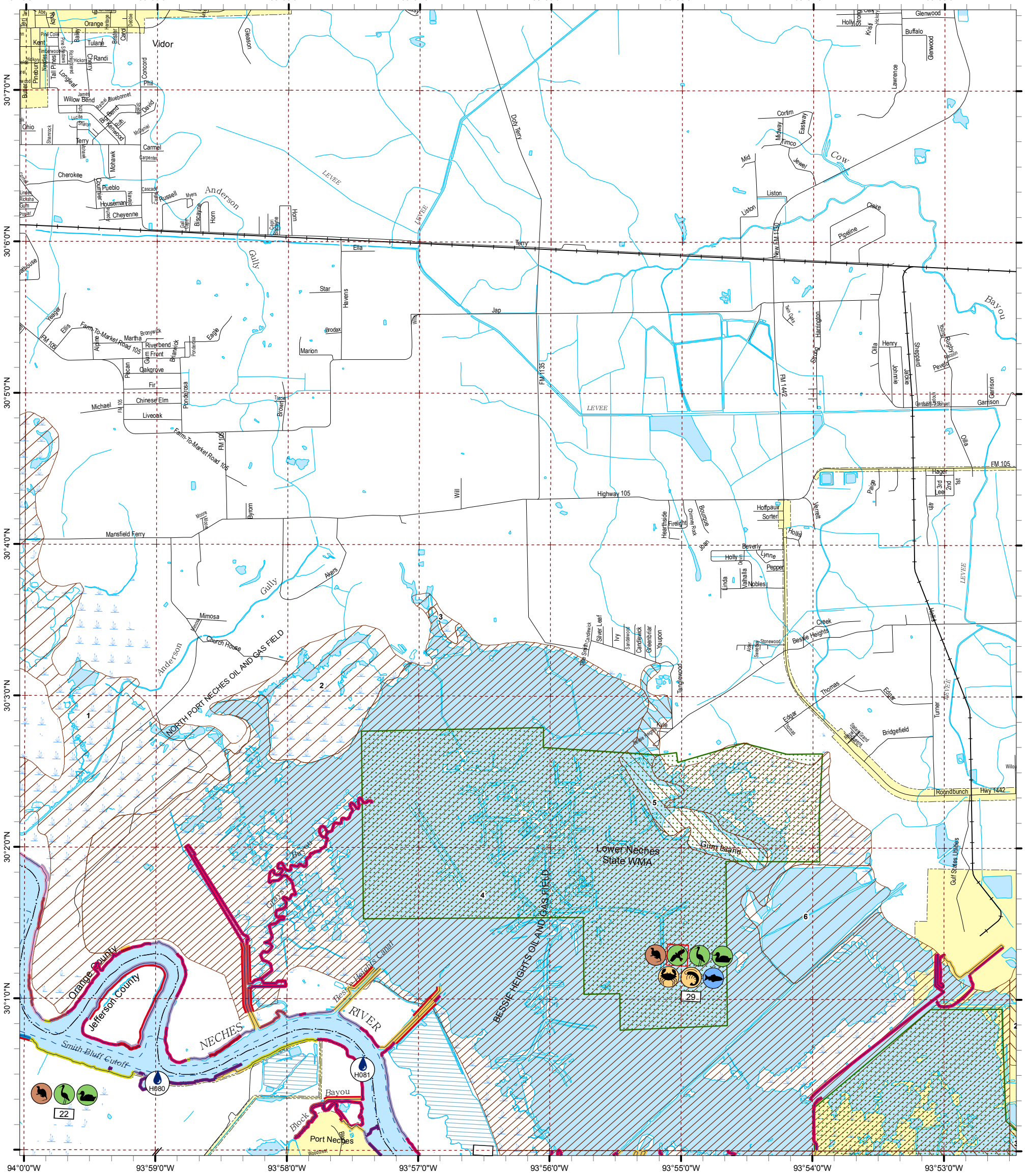
- 3A - Fine-Grained Sand Beaches
- 2B - Wave-cut Clay Platforms
- 2A - Scarps and Steep Slopes in Clay
- 1 - Exposed Walls and Other Solid Structures

- Counties TCEQ
- Municipal

TERRY

(TEXLA)

DATA ACP



TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

Oil Spill Planning and Response Atlas
Upper Coast of Texas
Summer, 2008

Miles: 0, 0.5, 1
Nautical Miles: 0, 0.5, 1
Feet: 0, 2,500, 5,000
Kilometers: 0, 1, 2

Depth Soundings in Feet

PRIORITY PROTECTION AREAS
- HIGH
- MEDIUM
- LOW

HUMAN-USE FEATURES
- Water Intake Point

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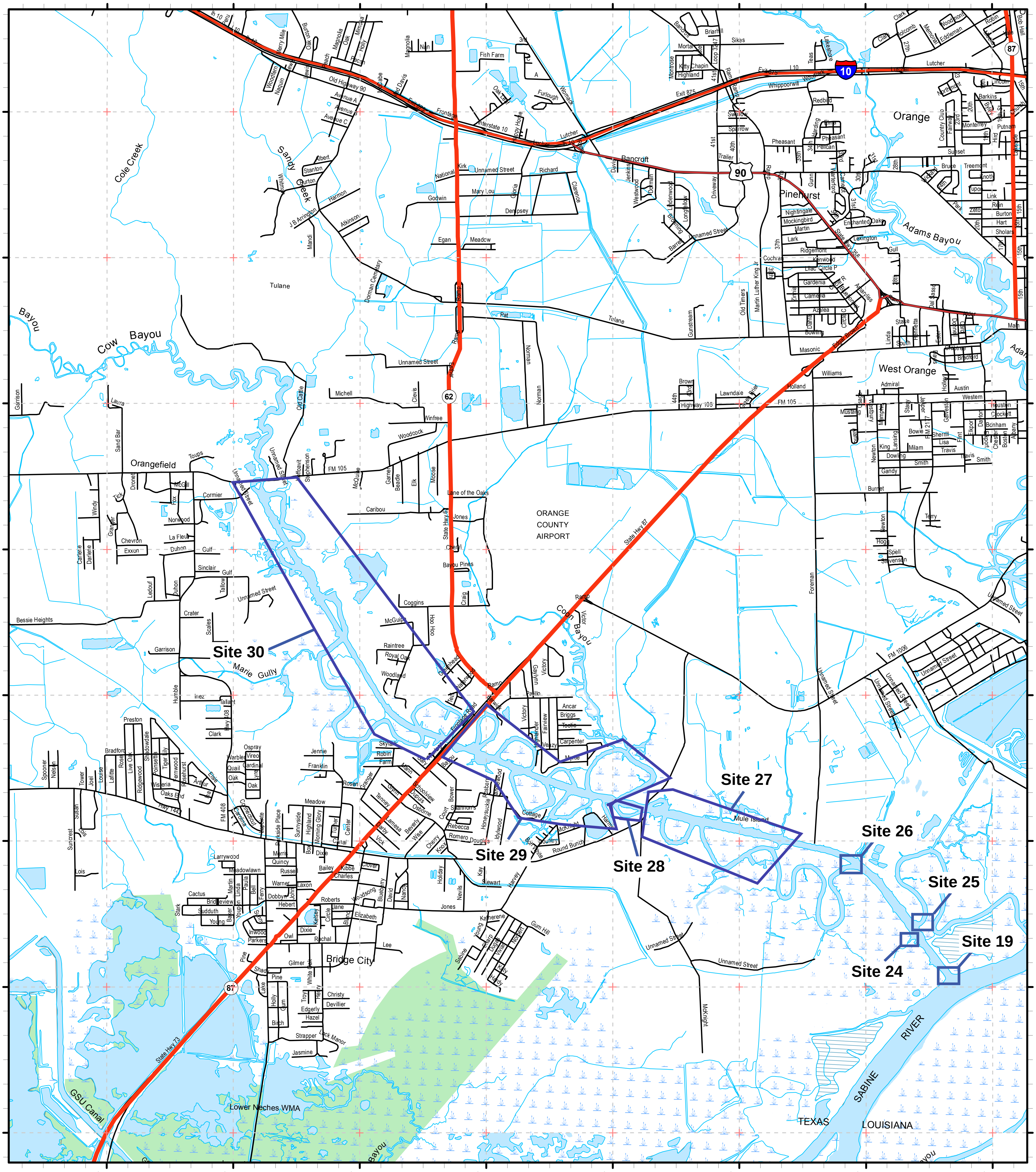
- 2A - Scarps and Steep Slopes in Clay
- 1 - Exposed Walls and Other Solid Structures

- State Parks/WMA
- Counties TCEQ
- Municipal

Orangefield Base Map

(MAURICEVILLE)



(TERRY)

(ORANGE)

(WEST OF GREENS BAYOU)

TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

0 0.5 1
Miles

0 0.5 1
Nautical Miles

0 2,000 4,000
Feet

0 1 2
Kilometers

N S W E

View Orangefield Response Map

Legend

Ditch/Canal	Lake/Reservoir	Sewage/Filtration Po
Beach	Seagrass	Wetland
Fish Hatchery	Bay/Gulf of Mexico	Wildlife Refuge
Flooded Quarry/Pit	Mangrove Area	Nature Conservancy of TX
Impounded Area	Mud/Tidal Flat	Park
Inundation Area	River/Stream	
Sand Dune	Upland	

Port Arthur North Base Map

(TERRY)

94°0'0"W 93°59'0"W 93°58'0"W 93°57'0"W 93°56'0"W 93°55'0"W 93°54'0"W 93°53'0"W

30°0'0"N 29°59'0"N 29°58'0"N 29°57'0"N 29°56'0"N

(PORT ACRES)

(WEST OF GREENS BAYOU)

Site 39
Site 37
Site 36
Site 38
Site 35
Site 34
Site 33
Site 148
Site 147

Port Neches
Nederland
Groves
PORT ARTHUR
Port Arthur Reservoir
NECHES RIVER
Molasses Bayou
Alligator Bayou
Sabine Neches Canal
PLEASURE ISLAND
SABINE LAKE

29°55'0"N 29°54'0"N 29°53'0"N

(PORT ARTHUR SOUTH)

TEXAS GENERAL LAND OFFICE OILSPILL PREVENTION & RESPONSE

HARDIN NEWTON JASPER CALCASIEU ORANGE JEFFERSON CAMERON AMBERS GALVESTON

0 0.5 1 Miles
0 0.5 1 Nautical Miles
0 2,000 4,000 Feet
0 1 2 Kilometers

N W E S

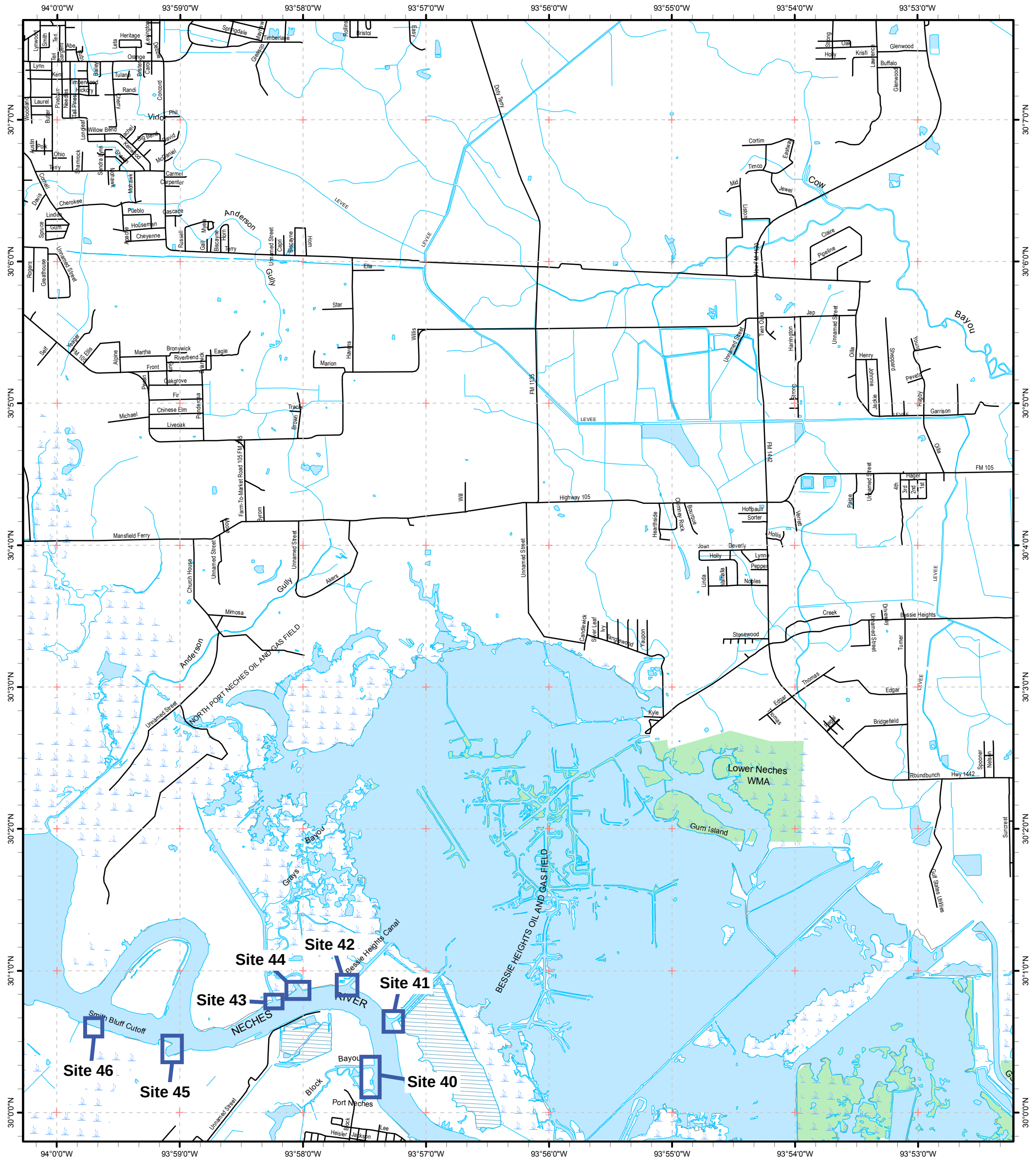
View Port Arthur North Response Map

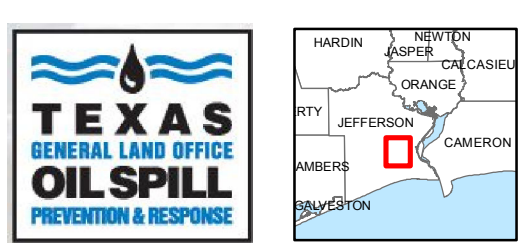
Legend

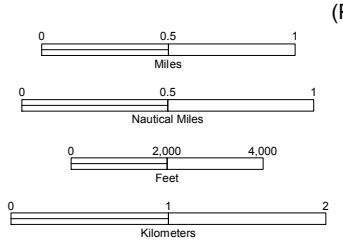
- Ditch/Canal
- Beach
- Fish Hatchery
- Flooded Quarry/Pit
- Impounded Area
- Inundation Area
- Sand Dune
- Lake/Reservoir
- Seagrass
- Bay/Gulf of Mexico
- Mangrove Area
- Mud/Tidal Flat
- River/Stream
- Upland
- Sewage/Filtration Po
- Wetland
- Wildlife Refuge
- Nature Conservancy of TX
- Park

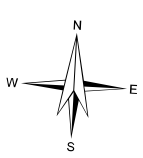
Terry Base Map

(TEXLA)









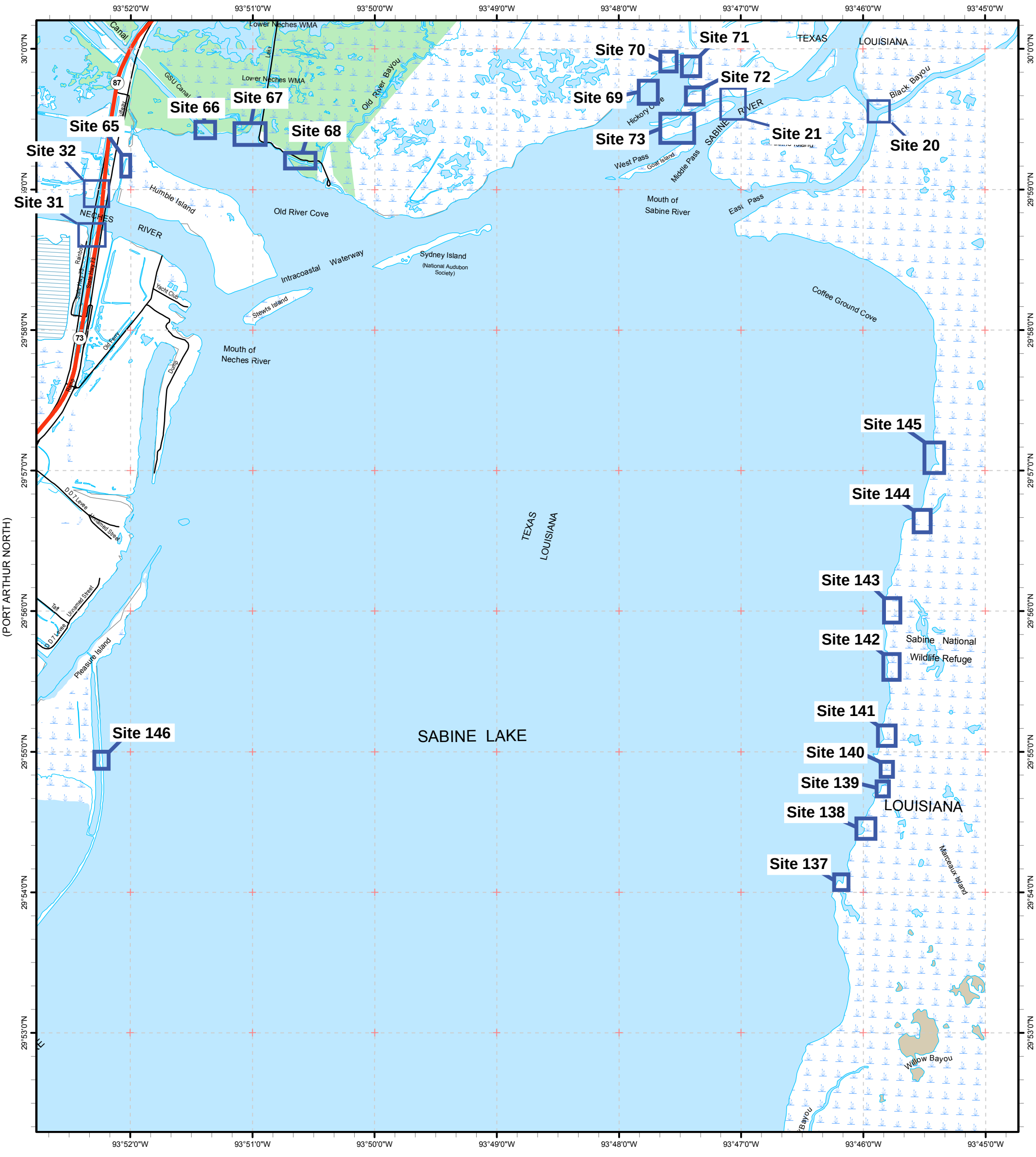
View Terry Response Map

Legend

- Ditch/Canal
- Beach
- Fish Hatchery
- Flooded Quarry/Pit
- Impounded Area
- Inundation Area
- Sand Dune
- Lake/Reservoir
- Seagrass
- Bay/Gulf of Mexico
- Mangrove Area
- Mud/Tidal Flat
- River/Stream
- Upland
- Sewage/Filtration Po
- Wetland
- Wildlife Refuge
- Nature Conservancy of TX
- Park

West Of Greens Bayou Base Map

(ORANGEFIELD)



(PORT ARTHUR NORTH)

(WEST OF JOHNSON'S BAYOU)

TEXAS GENERAL LAND OFFICE OIL SPILL PREVENTION & RESPONSE

0 0.5 1 Miles

0 0.5 1 Nautical Miles

0 2,000 4,000 Feet

0 1 2 Kilometers

N W E S

View West Of Greens Bayou Response Map

Legend

- Ditch/Canal
- Beach
- Fish Hatchery
- Flooded Quarry/Pit
- Impounded Area
- Inundation Area
- Sand Dune
- Lake/Reservoir
- Seagrass
- Bay/Gulf of Mexico
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SITE SPECIFIC HEALTH & SAFETY PLAN
FOR SUNOCO PARTNERS MARKETING & TERMINALS L.P.

SITE SPECIFIC HEALTH & SAFETY PLAN

FOR SUNOCO PARTNERS MARKETING & TERMINALS

I. SITE DESCRIPTION

(See Section 1.2)

II. ENTRY OBJECTIVES

A. General

It is the intent of SXL to operate its facilities in a safe and efficient manner. All personnel are obliged to follow the Company Safety Standards as well as OSHA, State and Federal regulations. No one is to attempt to circumnavigate these standards. Most standards and regulations are just plain common sense with the objective being to protect you and your fellow employees from injury or death and to safeguard the Company's assets and the surrounding environment.

SXL's Policy is:
..."to conduct its business in a manner which will protect the well-being of our employees, our customers, the general public -- and the environment. All SXL operations will comply with applicable safety, health, and environmental laws and regulations. All employees are responsible and accountable for performing their jobs mindful of their own safety, the safety of others and of our responsibilities of the environment in which we operate."

B. Specific

At SXL Terminals it is our objective to clean up all spills as quickly and efficiently as possible without exposing the people involved to hazardous chemicals or damaging the environment.

III. SITE ORGANIZATION

(See Section 1.1.2 Emergency Response Action Plan)

IV. SITE CONTROL

SXL has classified all spills into two types: small (less than 5-gallons of product) and large (greater than 5-gallons of product). Through our industrial hygiene monitoring and controlled studies, we have determined that small spills can be safely cleaned up by one person with or without the use of respirator protection.

Large spills may be able to be controlled and cleaned up with the resources available at a terminal or they may require the help of outside consultants. This will be determined by the Terminal Manager or his representative on site at the time of the spill.

It is our intent to clean up all small spills with the personnel present at the terminal unless abnormal circumstances pertain. We believe that our people have been adequately trained to clean up small spills and have the needed supplies to do so.

V. HAZARD EVALUATION

A. Chemical Hazards

The major chemicals transported at SXL's the facility are gasoline, crude oil and distillate products. Of these it has been determined that gasoline is the more hazardous due to its potential exposure and fire hazards. Each terminal has a specific list of the chemicals present for that site. This list is kept as an index to our MSDS Manual. Also it is part of our "HIT" list (Hazard Information Table) to be used to determine hazardous materials present in the chemicals. Employees and contractors are encouraged to use these lists to determine what hazards are present, what PPE to use, and for the appropriate first aid information. All of the applicable MSDS are also kept in this book.

B. Environmental Monitoring for Chemical Hazards

Since our products are petroleum hydrocarbons we generally monitor for them by using combustible Gas Meters. Each terminal has a Gastec Combustible Gas Meter that reads in both % and parts-per-million (ppm) of hydrocarbon vapors present. For all large spills or ones where we feel there may be a potential fire hazard present, we will use this instrument to secure the area before any cleanup operations are allowed. This instrument will be used by the terminal Manager or his representative who has been training in how to use it. For levels above 100 ppm appropriate respirators are required. If levels reach 10% of the LEL (Lower Explosive Limit) in the work zone then no one will be allowed to work in the contaminated area. This instrument is calibrated monthly and maintained by the terminal.

C. Additional Hazards

Additional hazards that could be present at the spill area include:

* Fire and/or Explosion
* Excavation Hazards
* Noise in Excess of 90 dba
* Confined Space Entry
* Lock Out/Tag Out
* Equipment & Vehicle Congestion
* Inclement Weather Conditions
* Possible Falls from Elevated Area
* Electrical Hazards

VI. GENERAL SITE SAFETY AND HEALTH PROCEDURES

A. Objectives

In cleaning up a spill it is our objective to:

1. Make sure the people cleaning up the spill are not overexposed to hazardous material.
2. Protect the environment.
3. Clean up the spill as quickly as possible without jeopardizing the safety of those doing the clean up.

4. Dispose of the clean up materials in a safe manner which complies with all local, state and federal requirements.

B. Proposed Activities

In cleaning up a small spill you should first make sure you have the proper personal protective equipment on. This will include impervious gloves and shoes. The next step is to make sure the product is not continuing to leak out from whatever container it is in. Many times this involves shutting off a valve, closing a system or activating an emergency shut off device. At this point you should make sure there are no other people in the area which could be exposed to the spilled product. Sometimes it is necessary to block off the area to make sure other do not enter the contaminated area. Also you should contact any other SXL personnel present to let them know you had a spill and to get any needed assistance. Lastly before you attempt to clean up the spill, you should make sure there are no sources of ignition in the area. If so these must be shut off or secured so they can not enter the contaminated area.

Next you must approach the spill from the upwind side and perform as much as possible of your cleanup work also in the upwind direction.

Then you should dike the spill so it does not spread any further than necessary. Also this will help to stop the spill from contaminating any additional ground or area. In doing this you should use either spill booms, spill pillows or lastly absorbent material;.

Once this spill is contained you should determine if you have the needed supplies to clean it up. If you do, then you should proceed to absorb the spill material with pads or absorbent material. Generally, spill pads are better than absorbent material to use because they are easier to clean up. During the clean up you should stay out of the vapor space of the material as much as possible and make sure there are not sources of ignition in the area.

Once all of the material has been cleaned up then all absorbent material must be placed in vapor tight plastic bags or other containers. Make sure the cleaned up product does not cause the bags to disintegrate and is capable of holding the material without any further leaks of product or vapors. This material should then be properly stored until it can be disposed of in accordance with local, State and Federal requirements.

If the spill is larger than 5 gallons then you should only: shut off sources of the product, warn any people in the area of the potential hazards, make sure there are no ignition sources present, and if you have enough materials, dike the spill; then you can contact your supervisor and get the needed help to safely clean up the remaining material.

C. SXL's Safety & Health Manual

Each terminal has a SXL Health, Environmental and Safety Manual which covers general and specific concern for operating safely in that terminal. For all safety and health concerns not covered by this Site Plan should be referred to this manual.

VII. PERSONAL PROTECTIVE EQUIPMENT (PPE)

For small spills impervious gloves and shoes are required. For larger spills the additional required PPE is determined by the potential hazards present. This determination will be made by the person monitoring the area or the contractor who will perform the clean up work. All additional PPE shall be worn in accordance with NIOSH, OSHA, and EPA requirements.

VIII. DECONTAMINATION EQUIPMENT

Decontamination will be accomplished by flushing the affected area and equipment with water/detergent. This water will then be collected in the containment area and pumped into containers for appropriate treatment and/or disposal.

IX. SANITATION AND PERSONAL HYGIENE

At the completion of all spill clean up activities the employees involved must take care to protect their own personal hygiene. All disposable garments should be carefully removed and treated as hazardous waste. All personal clothing that has been contaminated should be washed by a professional laundry or at least, washed by themselves. Employees need to make sure they wash their hands and any body parts that may have come in contact with contaminated materials. Showers are recommended to provide the best protection. After clean up and showers, employees need to pay particular attention to any rashes or symptoms they may develop. If these occur the employee needs to get medical attention immediately.

X. EMERGENCY PROCEDURES

See the Emergency Response Section of this plan for the details.

XI. COMMUNICATIONS

Our primary means of communication is through the use of the telephone. In addition to this some of the terminals have 2-way radios which can be used at the time of an emergency. Verbal and hand signals can also be used for directing activities within a close range.

XI. SITE SAFETY MEETINGS

Safety meetings are held monthly at each terminal by the Terminal Manager. Topics include general safety and health concerns as well as specific HAZWOPER clean up procedures. A record of attendance is maintained at the facility.

XII. TRAINING

All SXL's Terminal Managers have received 40 hour HAZWOPER training and meet the requirements for Hazmat technicians. All the remaining personnel at the terminal have received 8 hour HAZWOPER training and met the requirements for First Responder

(Operations Level). All groups received the required follow up training on a yearly basis. The records of this training are kept at the terminal.

XIV. SITE SAFETY OFFICER

Each Terminal Manager is the Site Safety Officer for that specific terminal. SXL's Manager of Health and Safety is the Safety Officer responsible for all safety related terminal operations and clean ups. SXL has an Emergency Management System (EMS) in place for all of its sites. This system is designed to help any site with the needed expertise in case of an emergency.

XV. AUTHORIZATIONS

The Terminal Manager and Area Operations Manager are the primary and secondary sources to activate all aspects of the site emergency plans. Each terminal has a back up Terminal Manager who can step in and activate the system if the primary Terminal Manager were not present. All employees at the site are instructed to contact the primary Terminal Manager in the case of all emergencies.

ACRONYMS

API	American Petroleum Institute
AST	Above ground storage tank; used to store petroleum products
CAFRA	Coastal Area Facility Review Act
CFR	Code of Federal Regulations
ECU	Environmental Control Unit used by Sunoco in emergency response situations; contains various types of spill response equipment (see list in plan)
EMS	Emergency Management System
EPA	United States Environmental Protection Agency; primary agency responsible for enforcement of federal laws protecting human health and the environment
F&D	Sunoco. Marketing "Facilities and Distribution" Department
FRP	Facility Response Personnel
G	Gallon
HES	Health, Environment, and Safety Department
HIT	Hazardous Information Table
HMIS	Hazard Materials Identification System
LEL	Lower Explosive Limit
MSDS	Material and Safety Data Sheets
MT	Marketing Terminal
NFPA	National Fire Prevention Association
NRC	National Response Center
NWI	National Wetland Inventory
OPA 90	Oil Pollution Act of 1990

OSHA	Occupational Safety & Health Administration; federal agency responsible for oversight and regulation of work place health and safety
OSRO	Oil Spill Removal Organization
PPE	Personal Protective Equipment
R&M	Refining and Marketing
SARA	Superfund Authorization Recovery Act
SPCC	Spill Prevention Control and Countermeasure Plan
T&E	Threatened and Endangered
TSDF	Treatment Storage and Disposal Facilities
USCG	United States Coast Guard
USGS	United States Geological Survey
UST	Underground Storage Tank; tank with 10% or more of its volume underground with connecting piping; used to store petroleum products

Nederland Terminal Spill History

Facility	Date/Time	Short Description	Incident Note	Agent	Contained Quantity	Recovered Quantity	Abbreviation	Environment
Nederland	7/13/2012 9:00	Nederland/Tank 1513 Overflow large rain event/Crude Oil/1,000 bbl	Rain over took Tank # 1513. Pumping at a rate of ~4500 bbls to Tank 1508, tank 1500, and 1506. The water incoming flow was steady at ~7500 to ~8000 bbls. RQ met. A significant rainfall event.	Crude Oil	1000	1000	BBL	Agency Reportable
Nederland	7/13/2012 5:30	Nederland/Lube Plant/Sump Overflow to rain event/Lube Oil/1 gallon	At 05:30 the lube sump was backfilling with water due to torrential rainfall. All three of the discharge pumps connected to the system were running but they could not keep up with the volume of the rain that was falling. The sump contained a small amount of residual lubricant oil that floated out into the paved containment area. As a precautionary measure both containment and absorbent booms were deployed around the sump to prevent the residual oil from floating and getting into other areas of the driveway, vacuum trucks were called in to assist in removing the water and a work crew was placed on the scene to facilitate the effort. As the rain continued to fall the pumps were inundated and the water continued to rise to the curbing and began to leak underneath the curbing and then traveled to the river where a small sheen was noticed by the USCG. Approximately 30' absorbent boom	Crude Oil	0	0	OZ	Agency Reportable
Nederland	2/7/2012 11:30	Nederland Marine Terminal / #1 Ship Dock Sump / Discharge Line / 1 quart	While discharging a vessel at #1 ship dock, a rainbow sheen was discovered by the dockman. The dockman immediately shut down discharging the vessel and contacted his shift supervisor. The #1 Ship Dock sump suction line was discovered to be leaking at the 5 O'clock positon on the 6" pipe. Root cause analysis will be determined after investigation is complete.	Crude Oil	0	0	SHEEN	Agency Reportable
Nederland	2/8/2010 20:40	Nederland Marine Terminal / Flange Connection Leak / "A" Barge Dock / 3 gal.	On 02/08/2010 at 2040 hours, Jerry Belk a SXL dockman was in the process of checking a bolted flange connection from our loading arm to a barges receiving manifold when the release occurred. Due to significant weather, the tankerman evacuated the barge before the connection was complete. By the tankerman's exit, Jerry assumed that the connection had been made and applied pressure to the loading arm to verify a secure connection had been made. The connection was not complete and by applying pressure it forced oil residue to escape from the connection point onto the barge and into the river. The three-gallons were picked up via sorbent pads and barge decontaminated. All internal and external notifications were made and a completed incident investigation is attached to IMPACT report.	Crude Oil	3	3	GAL	Agency Reportable
Nederland	9/29/2009 9:15	Nederland Marine Terminal / #4 Ship Dock Line / Located Behind #2 Ship Dock /	On 09/29/2009 at approximately 0915 hours, a third-party contractor (Triple "S") under the direction of SXL's guidance commenced excavating 20" firewater line to install a new firewater valve. While excavating the operator hit a piece of concrete into a T.D. Williams fitting located on one of the Terminals active pipelines unloading a ship. The operator built a levee to capture the released product while the transfer of the ship's cargo was terminated. A serious investigation has been initiated and results will be attached as soon as complete.	Crude Oil	90	90	BBL	Agency Reportable
Nederland	9/27/2009 4:37	Nederland Terminal / #3 Ship Dock / #1 Loading Arm / O-ring Failed / 1 bbl.	On 09/27/2009, at approximately 0437 hours, operations were making a line displacement from #3 Ship Dock to Valero Lucas, valve VD-309 on the #1 loading arm leaked. The leaking valve allowed product into #1 loading arm which at the time was flanged off. The pressure built up in the loading arm causing the o-ring to fail located behind the flange and releasing oil in the Neches River and dock containment. The one-barrel release was picked up from the river, pressure washed off the ship, and dock wiped free of oil. The valve was replaced on 09/28/2009. Since the displacement operation was suspended, oil that remained in the line built up pressure from temperature causing a gasketed flange to fail at #5 dock releasing a gallon and half of oil.	Crude Oil	1	1	BBL	Agency Reportable
Nederland	8/27/2009 18:25	Nederland Marine Terminal / #5 Ship Dock / #2 Loading Arm / Compression Fitting Malfunctioned / 1gal	On 08/27/2009 @ 1825 hours at #5 ship dock, loading arm #2 leaked hydraulic oil in the Neches River from a malfunctioned compression fitting. SXL had just received the loading arm from being refurbished, and found that the compression fittings were improperly installed. The fittings were repaired and loading arm put into service. There was no oil recoverable in the river.	Not Listed	0	0	GAL	Agency Reportable
Nederland	8/7/2009 1:30	Nederland Terminal / Exxon Mobile Station / Drain Valve Left Open After Tie-In / 7 bbls	AT 0115/7 THE LOTO WAS COMPLETELY REMOVED FROM EXXON MOBIL PUMP STATION TIE IN. OTHA BROWN (SXL A OPERATOR) CALLED MOBIL PUMP STATION IN HOUSTON @ 0125/7 TO CONFIRM THAT THEY WERE READY TO START. AT 0130/7OTHA STARTED THE MOBIL PUMP WITH JUSTIN BOYTON (SXL B OPERATOR) STANDING BY AT MOBIL STATION. AT APPROXIMATELY 0131/7 JUSTIN CALLED OTHA TO SHUT THE PUMP DOWN DUE TO OIL COMING OUT OF THE SUMP. OTHA SHUT THE PUMP DOWN. IT WAS FOUND THAT THE DRAIN VALVE WAS LEFT OPEN THAT OVERFILLED THE SUMP BUT MIGRATED INTO AN EXISTING EXCAVATION.	Crude Oil	7	7	BBL	Agency Reportable
Nederland	4/28/2009 9:09	Nederland/Lab Sump /Rain event / Overfilled Sump / 20 gal.	On 04/28/2009 at 0900 hours, Chad Richard (Nederland's Water Tech) while performing pre-discharge measures for outfall #2 noticed oil in the outfall ditch. Chad made all applicable internal notifications. It was determined that the twenty-gallon oil release generated from the lab sump that overfilled during a significant rain event. The impacted soil will be bio-remediated on-site.	Crude Oil	20	0	GAL	Agency Reportable-Courtesy
Nederland	3/4/2009 8:00	Tank # 1509 / Mixer Leak / 48 bbls	On 03/04/2009 at approximately 0800 hours, an in-plant contractor (Charles Brewer) notified Sunoco Logistics personnel of oil on the ground inside tank #1509 levee. Tank #	Crude Oil	48	40	BBL	Agency Reportable
Nederland	2/4/2009 7:30	Frac Tank Overfill / Tank # 1525 / Tank Roof Failure (9.5bbls)	On 02/04/2009 at approximately 0730 hours, Jerry Hanley (SXL Contractor) contacted Duty Foreman after noticing oil overfilling from a frac tank located inside tank # 1525's levee.	Crude Oil	10	8	BBL	Agency Reportable
Nederland	12/19/2008 13:00	2" BALL VALVE LEAKED @ BLIND FLANGE	A 2" BALL VALVE / BLIND FLANGE LEAKED INTO THE RIVER ABOUT 10 GALLONS	Crude Oil	10	0	GAL	Agency Reportable

Nederland	12/3/2008 10:00	Lube Oil Spill- Pump leak- Tk 61 to Tank truck loading	.A lube oil spilled at approx. 9:30 AM. The GTLS product - Taro HT 70 was being pumped from Tank 61 to a truck in the backend of the lube warehouse. The Operator that was loading the truck was Darrell Hunter (Lube Operator B). The spill was found by Darnell Smith (contract employee). Darnell was walking from the pumphouse when he noticed the spill and reported it to Charlie Lieby- Lube Operator A. Charlie immediately notified Darrell of the spill and the pump was shut down. There appears to be approx 25 bbls of product that was spilled onto the pump platform, containment area and onto the soil in that area of the plant. Maintenance has repaired the nipple and witness statements are being gathered. It appears this pump was installed during the GTLS modifications approx. 3 years ago.	Fuel Oil	20	18	BBL	Agency Reportable
Nederland	11/4/2008 12:00	Nederland Marine Terminal / Tank 1517 Overfill	On 11/04/2008 at approximately 1235 hours, Rodney Anderson a third party contractor (Nathan Smart) noticed oil coming from the tank vents of tank # 1517. Rodney notified central control immediately and emergency response was activated. Approximately 195 barrels released from the tank into the levee. The standing product was recovered via vacuum truck and returned to inventory. The impacted soil will be remediated on-site inside the tank levee. Nederland's management is investigating the cause.	Crude Oil	195	185	BBL	Agency Reportable
Nederland	6/12/2008 14:30	HAD TWO STREAMS GOING ON SAME LINE SHUT ONE DOWN AND CLOSED VALVE	(Billy Butler) A-operator WAS TRYING TO SWITCH LINES AROUND TO PUMP GCB BARGES AND WAS ASKED TO SHUT DOWN TK 1510 TO 1544 TRANSFER SO WE COULD LOAD BARGES STARTED CLOASING OFF TRANSFER AND FORGOT THAT WE HAD TWO STREAMS IN THE SAME LINE BILL LAIRD TRIED TO OPEN VALVE BACK UP BUT LINE PRESSURED UP BEFORE IT REOPEN. The release consisted of twenty-five barrels with an impacted area of 75'X80'	Crude Oil	25	23	BBL	Agency Reportable
Nederland	5/9/2008 2:50	Nederland Marine Terminal / #5 Ship Dock / Hydro-Test / Ball Valve Failure	After successfully performing annual required hydro-test of loading arms on #5 ship dock, during drainage of the oily water mixture a leak occurred. The ball valve that was determined to be the cause is located approximately 30" in the air on top of water. When the ball valve failed spraying oily water mix on the loading arm a few drips blew into the Neches River from a strong southerly wind of 15 mph. It was determined to be less than one quart released into the river where all internal and external notifications where made. The ball valve was bent preventing it from being fully closed; all other ball valves on the loading arms are being inspected and changed when found flawed.	Crude Oil	0	0	GAL	Agency Reportable
Nederland	4/1/2008 15:50	Nederland Marine Terminal / DOE Manifold / Sump Overfill	On 04/01/2008, while going to conduct maintenance on a valve at DOE manifold, Dan Brinkley (Sunoco Electrician) noticed product coming from the DOE sump. Dan notified central control where the system was shut down immediately. All applicable internal and external notifications were made and emergency response initiated. The sump had alarmed of high level earlier that morning and maintenance had the sump down until repaired. Central control never received confirmation that the sump had been vacuumed out so as a result never reset the alarm. When central control later that day was moving product thru DOE is when the sump overfilled due from the alarm never being reset. An investigation is underway to prevent his from happening again.	Crude Oil	20	20	BBL	Agency Reportable

Appendix I- Wildlife Protection and Rehabilitation/Endangered Wildlife

General Response Information Guide

- Sunoco Logistics will support wildlife protection and rehabilitation efforts during a response, but will not typically directly manage these efforts.
- Sunoco Logistics personnel will not attempt to rescue or clean affected wildlife, because such actions may cause harm to the individual or may place the animals at further risk.
- Federal and state agencies responsible for wildlife capture and rehabilitation will typically coordinate and capture and rehabilitating oiled wildlife
- Wildlife rehabilitation specialists may be utilized to assist in capturing and rehabilitated oiled animals as well as deterring unaffected animals away for the spill site
- U.S. Fish and Wildlife is to be notified and consulted in establishing incident specific priorities for the protection of the resources provided

Species Search Results for Jefferson County

Taxon	Common Name	Scientific Name	Federal Status	State Status
Amphibians	Pig frog	Lithobates grylio		
Birds	Henslow's Sparrow	Ammodramus henslowii		
Birds	Sprague's Pipit	Anthus spragueii	C	
Birds	Snowy Plover	Charadrius alexandrinus		
Birds	Western Snowy Plover	Charadrius alexandrinus nivosus		
Birds	Southeastern Snowy Plover	Charadrius alexandrinus tenuirostris		
Birds	Piping Plover	Charadrius melodus	LT	T
Birds	Reddish Egret	Egretta rufescens		T
Birds	Swallow-tailed Kite	Elanoides forficatus		T
Birds	Peregrine Falcon	Falco peregrinus	DL	T
Birds	American Peregrine Falcon	Falco peregrinus anatum	DL	T
Birds	Arctic Peregrine Falcon	Falco peregrinus tundrius	DL	
Birds	Bald Eagle	Haliaeetus leucocephalus	DL	T
Birds	Black Rail	Laterallus jamaicensis		
Birds	Wood Stork	Mycteria americana		T
Birds	Brown Pelican	Pelecanus occidentalis	DL	
Birds	White-faced Ibis	Plegadis chihi		T
Fishes	American eel	Anguilla rostrata		
Fishes	Smalltooth sawfish	Pristis pectinata	LE	E
Insects	Bay skipper	Euphyes bayensis		
Mammals	Red wolf	Canis rufus	LE	E
Mammals	Rafinesque's big-eared bat	Corynorhinus rafinesquii		T
Mammals	Southeastern myotis bat	Myotis austroriparius		
Mammals	Plains spotted skunk	Spilogale putorius interrupta		
Mammals	Black bear	Ursus americanus	T/SA;NL	T
Mammals	Louisiana black bear	Ursus americanus luteolus	LT	T
Mollusks	Texas pigtoe	Fusconaia askewi		T
Mollusks	Wabash pigtoe	Fusconaia flava		
Mollusks	Sandbank pocketbook	Lampsilis satura		T
Mollusks	Southern hickorynut	Obovaria jacksoniana		T
Mollusks	Louisiana pigtoe	Pleurobema riddellii		T
Mollusks	Texas heelsplitter	Potamilus amphichaenus		T
Mollusks	Wartyback	Quadrula nodulata		
Mollusks	Creeper (squawfoot)	Strophitus undulatus		
Mollusks	Fawnsfoot	Truncilla donaciformis		

Mollusks	Little spectaclecase	Villosa lienosa		
Plants	Chapman's orchid	Platanthera chapmanii		
Plants	Florida ladies-tresses	Spiranthes brevilabris var. floridana		
Reptiles	Loggerhead sea turtle	Caretta caretta	LT	T
Reptiles	Northern scarlet snake	Cemophora coccinea copei		T
Reptiles	Green sea turtle	Chelonia mydas	LT	T
Reptiles	Timber/Canebrake rattlesnake	Crotalus horridus		T
Reptiles	Leatherback sea turtle	Dermochelys coriacea	LE	E
Reptiles	Atlantic hawksbill sea turtle	Eretmochelys imbricata	LE	E
Reptiles	Sabine map turtle	Graptemys ouachitensis sabinensis		
Reptiles	Kemp's Ridley sea turtle	Lepidochelys kempii	LE	E
Reptiles	Alligator snapping turtle	Macrochelys temminckii		T
Reptiles	Texas diamondback terrapin	Malaclemys terrapin littoralis		
Reptiles	Gulf Saltmarsh snake	Nerodia clarkii		
Reptiles	Texas horned lizard	Phrynosoma cornutum		T

Texas General Land Office
Oil Spill Prevention and Response

Oiled Wildlife Response Information Guide

General Response

- Federal regulations prohibit handling of migratory birds.
- Untrained personnel should not attempt to rescue oiled wildlife because of the potential of serious, sometimes fatal zoonotic diseases (transmission of disease from animal to human.)
- Oiled animals can inflict serious injury to untrained personnel.
- Only personnel from state fish & game agencies and U.S. Fish & Wildlife Service, or properly trained and permitted rehabilitators designated by these agencies are allowed to capture oiled wildlife.
- Make appropriate notifications and await instruction from licensed personnel on how to deal with affected wildlife.
- Only personnel licensed by the State of Texas are allowed to handle oil wildlife.

Resources

TX General Land Office 24 Hour Oil Spill Notification
800-832-8224

Wildlife Rehab & Education
Sharon Schmalz, Certified Oiled Wildlife and Response Team Member
Federal License # PRT673173 • State License # SPH090-090 • LA License # R-09-30
Margaret Pickell, Certified Oiled Wildlife & Response Team Member
Upper and Lower Coast: Cell 281-731-8826 • Office 713-861-9453 • Pager 713-279-1417 • Home 281-332-8319

Wildlife Response Services LLC
Rhonda Murgatroyd, Certified Oiled Wildlife & response Team Member
Federal License # SPRH039465, TX License # REH-0401-713, LA License # R-07-13
713-705-5897 • Pager 281-266-0054

UPPER COAST

Region 1 (Beaumont/Port Arthur)
Region 2 (LaPorte / Houston)

Texas Parks and Wildlife
281-842-8100 (24 hrs)

Texas Parks and Wildlife – Spills and Kills-Winston Denton
281-534-0138 • 281-842-8100 • 281-534-0130 (office)

U.S. Fish & Wildlife (pager for Ron Brinkley)
281-286-8282 • Pager 281-505-4754 • Cell 713-542-1873

LOWER COAST

Region 3 (Corpus Christi • Region 4 (Brownsville)
Region 5 (Pt. Lavaca)

Texas Parks and Wildlife
956-350-4490

Texas Parks and Wildlife - Spills and Kills
361-825-3246

U.S. Fish & Wildlife (*pager for Claire Lee*)
512-994-9005

Animal Rehabilitation Keep (ARK) – Port Aransas, TX
361-749-6793